

# **EXHIBIT F**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
SUSAN MCCARTHY,

Plaintiff,

- against -

Civil Action No. 15-CV-1468

ROOSEVELT UNION FREE SCHOOL DISTRICT,  
DEBORAH L. WORTHAM, Individually and her  
Official capacity, CLYDE BRASWELL, Individually  
And in his official capacity, EDITH L. HIGGINS,  
Individually and in her official capacity;  
Roosevelt Union Free School District Employees  
JOHN DOE 1-10 (the name "John Doe" being  
fictitious, as the true names are presently  
unknown), COUNTY OF NASSAU, NASSAU COUNTY  
POLICE DEPARTMENT, POLICE OFFICER JOSEPH  
STASSI, Individually and in his official  
Capacity, POLICE OFFICER MONIQUE AMODEO,  
Individually and in her official capacity,  
MEDIC MATTHEW FIELD, Individually and in his  
Official Capacity, Nassau County employees  
John Doe 11-20 (the name "John Doe" being  
fictitious, as the true names are presently  
unknown),

Defendants.

-----X

1 West Street  
Mineola, New York

January 8, 2016  
10:20 a.m.

EXAMINATION BEFORE TRIAL OF SUSAN MCCARTHY,  
the Plaintiff, herein, taken by the attorneys for  
the respective parties, pursuant to Notice, held at  
the above place and time before Susan DeGennaro, a  
Stenotype Reporter and Notary Public within and for  
the State of New York.

ORIGINAL

1 A P P E A R A N C E S

2

3 WOLIN & WOLIN

Attorneys for the Plaintiff  
4 420 Jericho Turnpike, Suite 215  
Jericho, New York 11753

5

6 BY: ALAN E. WOLIN, ESQ.

7 CARNELL T. FOSKEY, ESQ.

Nassau County Attorney  
8 For the Defendants  
COUNTY OF NASSAU, NASSAU COUNTY  
9 POLICE DEPARTMENT, POLICE OFFICER  
JOSEPH STASSI, POLICE OFFICER  
10 MONIQUE AMODEO, and MEDIC MATTHEW FIELD  
One West Street  
11 Mineola, New York 11501

12 BY: LIORA M. BEN-SOREK, ESQ.

13

14 SILVERMAN & ASSOCIATES

Attorneys for the Defendants  
15 ROOSEVELT UNION FREE SCHOOL DISTRICT,  
DEBORAH L. WORTHAM, CLYDE BRASWELL,  
16 EDITH L. HIGGINS,  
445 Hamilton Avenue, Suite 1102  
17 White Plains, New York 10601

18 BY: GERALD S. SMITH, ESQ.

19

20

21

22

23

24

25

1 S T I P U L A T I O N S

2

3 IT IS HEREBY STIPULATED AND AGREED, by  
4 and between the attorneys for the respective  
5 parties hereto, that the filing, sealing and  
6 certification of the within deposition shall be and  
7 the same are hereby waived;

8 IT IS FURTHER STIPULATED AND AGREED  
9 That all objections, except as to form of the  
10 Question, shall be reserved to the time of the  
11 trial;

12 IT IS FURTHER STIPULATED AND AGREED  
13 That the within deposition may be signed before any  
14 Notary Public with the same force and effect as if  
15 signed and sworn to before the Court.

16

17

18

19

20

21

22

23

24

25

1 S U S A N M C C A R T H Y,

2 The witness herein, having first been duly  
3 sworn by Susan DeGennaro, a Notary Public within  
4 and for the State of New York, was examined and  
5 testified as follows:

6 EXAMINATION BY GERALD S. SMITH, ESQ.:

7 Q Please state your name for the record.

8 A Susan McCarthy.

9 Q Please state your address for the record.

10 A 52 8th Street, Hicksville, New York  
11 11801.

12 MR. WOLIN: Before we start the  
13 questions, the Plaintiff is not waiving  
14 the reading or the signing of the  
15 transcript.

16 Q Good morning, Ms. McCarthy. We met  
17 before, my name is Jerry Smith. I am an attorney who  
18 has been retained by the school district to ask you  
19 some questions today pertaining to your lawsuit.

20 I will remind you, it's been a while  
21 since we did this, I will refresh your memory in a  
22 few ways so we can make things go easier today.

23 First of all, the court reporter is going  
24 to take down everything you and I say. One of the  
25 things we can do to make that job easier for her is,

1 please make sure you give verbal responses. Even if  
2 it is a yes or no answer, you have to articulate yes  
3 or no. The court reporter can't take down a shake  
4 of the head or an uh-huh or anything like that,  
5 okay?

6 A Okay.

7 Q Also, it might become conversational with  
8 us, you might know where my question is going, even  
9 if that is the case, I would ask that you let me  
10 finish my question before you start your answer.

11 At the same time, I will do my best to  
12 make sure you have completed an answer before I  
13 begin speaking, because if we speak over each other  
14 it gets much more confusing for the court reporter,  
15 okay?

16 A Okay.

17 Q If you need a break at any time, please  
18 let us know, the only thing I would ask, if there is  
19 a question pending, you answer the question before  
20 we take that break, okay?

21 A Okay.

22 Q Finally, if there is anything about a  
23 question that you don't understand, please let me  
24 know, so I can rephrase it.

25 If you do answer a question, I am going

1 to assume you knew what I meant, okay?

2 A Okay.

3 Q Have you taken any medications in the  
4 last twenty-four hours that might impair your  
5 ability to testify truthfully and accurately today?

6 A No.

7 Q Can you think of any other reasons why  
8 you may not be able to testify truthfully and  
9 accurately today?

10 A No.

11 Q Do you recall providing testimony in  
12 response to questions from me on or about September  
13 4, 2014?

14 A Yes.

15 Q Subsequent to that day when you answered  
16 my questions, do you recall if you were provided a  
17 transcript of that examination for you to review?

18 A Yes.

19 Q Do you recall reviewing it?

20 A Yes.

21 Q Do you recall signing that transcript?

22 A Yes.

23 Q At the time you signed it, do you recall  
24 believing at the time, the testimony in the  
25 transcript was truthful and accurate?

1 A Yes.

2 Q Are you currently employed by the  
3 Roosevelt Union Free School District?

4 A Yes.

5 Q What is your current position?

6 A First grade.

7 Q Is that the same position you held  
8 September 2014 when we last spoke?

9 A Yes.

10 Q Between September 2014 and today has your  
11 position changed at any time?

12 A No.

13 Q You taught first grade the whole time?

14 A Yes.

15 Q Who is your current building principal?

16 A Mr. Braswell.

17 Q Mr. Braswell was also the principal in  
18 2015, correct?

19 A Yes, he was.

20 Q At any point between September of 2014  
21 and today have you had any other building  
22 principals?

23 A No.

24 Q Who are your current assistant  
25 principals?



1 A Ms. Higgins.

2 Q Do you have any others?

3 A No.

4 Q Since September 2014 between then and  
5 today have you had any other assistant principals?

6 A No.

7 Q Are there any other individuals today who  
8 you would consider supervisors to whom you report?

9 A No.

10 Q Are there any individuals in the building  
11 today who perform, other than Mr. Braswell and Ms.  
12 Higgins, who perform evaluations of you or observe  
13 you in the classroom?

14 MR. WOLIN: Objection, you can  
15 answer.

16 A No.

17 Q Between September 2014 and today have  
18 there been any other individuals that you have  
19 considered supervisors?

20 MR. WOLIN: Objection, you can  
21 answer.

22 A No.

23 Q Since we last spoke in September of  
24 2014, regarding Mr. Braswell or Ms. Higgins, made  
25 any comments to you regarding your race or your age?

1 A No.

2 Q Has anyone in the school district made a  
3 comment to you regarding your race or your age  
4 since September 2014?

5 A No.

6 Q How many students do you have in your  
7 current class?

8 A As of this moment twenty-four.

9 Q When you say as of this moment, has that  
10 number fluctuated during the school year?

11 A Yes.

12 Q Can you give me a sense of how it has  
13 fluctuated?

14 A Some children move. Some children live  
15 with grandparents and come back. Some children are  
16 out of district and when the district finds out that  
17 the child is not supposed to be in that particular  
18 school, they are sent to the proper school.

19 Q When this school year started in  
20 September 2015, how many students were assigned to  
21 your class?

22 A I don't remember.

23 Q Do you recall if it was more or less than  
24 the twenty-four you have now?

25 A I think, I don't remember.

1 Q How many other sections of first grade  
2 are there?

3 A There is four.

4 Q Do you know how many students are in each  
5 of those other three classes?

6 A Three of them have about twenty-three  
7 children in each. Bilingual class has a smaller  
8 class.

9 Q Putting aside the bilingual class, the  
10 other three sections, do you know if those numbers  
11 have fluctuated during the school years?

12 A I would imagine, yes.

13 Q Do you know the names of the other  
14 teachers who teach sections of first grade?

15 A This year?

16 Q Yes.

17 A Ms. Bernard, Ms. Miles, myself, and  
18 Ms. Martinelli.

19 Q With regard to Ms. Bernard, what is her  
20 race, how would you describe her race?

21 A She is Jamaican.

22 Q How about Ms. Miles?

23 A Ms. Miles is Black.

24 Q How about Ms. Martinelli?

25 A Hispanic.

1 Q Do you know approximately how old  
2 Ms. Bernard is?

3 A No.

4 Q Do you know if she is over forty?

5 A I am not really good with ages.

6 MR. WOLIN: Don't guess, if you don't  
7 know, say you don't know.

8 A I don't know.

9 Q How about either Ms. Miles or  
10 Ms. Martinelli?

11 A Ms. Martinelli is around that, forty-ish.  
12 And Ms. Miles I would think is in her fifties.

13 Q Have you complained to anyone in the  
14 district this current school year that you have more  
15 children in your class than there are in the other  
16 sections of first grade?

17 A No.

18 Q Since September 2014 have either  
19 Ms. Braswell or Ms. Higgins taken any action against  
20 you that you feel were due to your race or age?

21 A No.

22 Q Have you received observation reports for  
23 evaluation since 2014?

24 A Last year, '14, '15.

25 Q Let me go back, the last time we spoke

1 was in September 2014, correct?

2 A Yes.

3 Q In a given school year, how many times are  
4 you evaluated?

5 MR. WOLIN: Objection, you can answer  
6 it.

7 A There is five minis and two formals.

8 Q Since September 2014, if you recall  
9 roughly, how many minis and how many formals have  
10 you received?

11 A Seven.

12 Q Have they all been conducted or completed  
13 by either Mr. Braswell or Ms. Higgins?

14 A Yes.

15 Q Would you describe those as positive or  
16 negative evaluations?

17 A Positive.

18 Q The curriculum that you teach in your  
19 first grade this year, is that curriculum guided to  
20 some degree by the common core standards?

21 A Yes.

22 Q Is that the case for all the other  
23 sections of first grade?

24 A Yes.

25 Q That is pretty much the case for all

1 teachers in the district; isn't it?

2 A Yes.

3 Q Is it your contention that the common  
4 core curriculum requirements that are applied to you  
5 are being applied to you because of your race or  
6 age?

7 MR. WOLIN: Objection, you can  
8 answer.

9 A No.

10 Q Are there any ways you can identify today  
11 that you believe you were discriminated against  
12 since September 2014 by anyone in the district?

13 A No.

14 Q When we spoke in September 2014 I believe  
15 you identified that you were taking some  
16 prescription medications; do you recall that?

17 A Yes.

18 Q Do you recall what medications you were  
19 taking in September 2014?

20 A Yes.

21 Q What were they?

22 A Topamax, Zoloft, which is Sertraline,  
23 which is the Generic brand. And Lipitor and Fiorinal  
24 which is a breakthrough medication for my migraines.  
25 And then --

1 MR. WOLIN: We can leave a space in the  
2 record and fill in the medications.

3 (INSERT)

4 Q Prior to September 2014 how long have you  
5 been taking the medications.

6 MR. WOLIN: Objection, each one?

7 Q Yes, why don't you go through each one?

8 A I'm sorry, I don't know if I could break  
9 it down.

10 Q Okay, are you still taking all of those  
11 medications today?

12 A Yes.

13 Q Has there been any point in time between  
14 September of 2014 and today where you stopped taking  
15 any one of those medications?

16 A No.

17 Q Have your dosages of those medications  
18 changed since September 2014?

19 A No.

20 Q When is the last time your dosage for any  
21 of those medications was altered?

22 MR. WOLIN: If they, in fact, have  
23 been. I don't think she testified they  
24 have been.

25 A I don't recall.

1 Q Who is the medical providers that  
2 prescribe those medications to you?

3 A My general practitioner.

4 Q Do you currently see any providers other  
5 than your general practitioner?

6 A I have a neurologist.

7 Q When did you begin seeing a neurologist?

8 A About six or seven years ago.

9 Q Since September 2014 have you seen a  
10 psychiatrist or psychologist?

11 A No.

12 Q Have you visited with a therapist?

13 A No.

14 Q In September 2014 I believe you testified  
15 you had been diagnosed with depression and anxiety;  
16 is that correct?

17 A Yes.

18 Q Are you still diagnosed with those  
19 conditions today?

20 A Nothing has changed, so, yes.

21 Q Other than your general practitioner or  
22 your neurologist, you don't see any other providers  
23 in connection with those conditions, correct?

24 A No.

25 Q The medications that you identified, do



1 you take them on a daily basis?

2 A Yes.

3 Q Has there been a point in time since  
4 September 2014 and now where the frequency in which  
5 you took them changed?

6 A No.

7 Q I recall from the last time we spoke, the  
8 breakthrough medicine for you migraines, that is  
9 something you take on an as needed basis, correct?

10 A Yes.

11 Q Since September 2014 until today, do you  
12 know on how many occasions you had to take that  
13 breakthrough medication?

14 A It has increased since then.

15 Q How would you describe the frequency, is it a  
16 weekly, monthly event?

17 A I would say I take it weekly instead of  
18 monthly. I would take it twice a month, now I take  
19 it at least once a week.

20 Q That is because the migraine has become  
21 so powerful?

22 A Yes.

23 Q When is it that you first started to take  
24 the breakthrough medication at this increased  
25 basis?

1 A Right around the incident time.

2 Q The incident that we are talking about  
3 was in May of 2014, correct?

4 A Yes.

5 Q Have you seen any medical providers to  
6 talk about the fact that you are taking this  
7 breakthrough medication or need to take this more  
8 frequently?

9 A No.

10 Q Has anybody advised you that you should  
11 see someone about this issue?

12 A My children.

13 Q When these migraines occur that require  
14 the breakthrough medication, do these migraines  
15 occur during the day?

16 A They could occur any time.

17 Q Have they occurred during the day?

18 A Yeah.

19 Q Have they occurred while you were at  
20 work?

21 A Yes.

22 Q Have there been occasions since September  
23 of 2014 you had to leave work early because of your  
24 migraines?

25 A No.

1 Q When you take the breakthrough  
2 medication, how long typically is it you feel the  
3 effects of that medication?

4 A Sometimes immediately and sometimes I  
5 need a second dose.

6 Q Could you describe for me, first of all,  
7 when you have the onset of a migraine, what are the  
8 symptoms, what do you feel?

9 A It usually starts with pressure on both  
10 sides of my head here. It effects my eyes, my  
11 eyesight. Lights bother my eyes. Sometimes it  
12 comes up from the back of my neck, that is usually  
13 the beginning of it.

14 Q How does the breakthrough medication calm  
15 those affects?

16 MR. WOLIN: Objection.

17 A I am not a doctor, sometimes it  
18 immediately goes away.

19 Q I am not asking how chemically it helps,  
20 when you take the medication, how do you feel after  
21 you take the medication?

22 A Great.

23 Q The pressure goes away?

24 A In years before it just went right away.  
25 Now sometimes it doesn't go right away.

1 Q How long do you wait before you take that  
2 second dose?

3 A Six hours.

4 Q During those six hours, are you still  
5 feeling the effects of the migraine?

6 A Yes.

7 Q Of the medications that you were  
8 prescribed including the breakthrough, the Zoloft,  
9 have you ever been advised that these medications  
10 might affect your memory in anyway?

11 A Topamax has a problem with retrieval,  
12 word retrieval, if I get excited and I want to say  
13 something, the word might not come to me. I might  
14 have difficulty remembering it. They said that was  
15 a side effect, but other than that, no.

16 Q Have you ever been advised that these may  
17 impact your memory when mixed with other substances  
18 or medications?

19 A Alcohol makes you tired.

20 Q Other than making you tired, have you  
21 ever been advised these medications along with  
22 alcohol will impact you in any way?

23 A Not to my knowledge.

24 Q How often do you consume alcohol?

25 A Occasionally with dinner a glass of wine.

1 Q What do you mean by occasionally?

2 A Once in a while.

3 Q When you say once in a while, is that less  
4 than on a nightly basis?

5 A Yes.

6 Q Is it three times a week?

7 A No.

8 Q Less than that?

9 A Yes.

10 Q Has there ever been a point in time where  
11 you were consuming alcohol on a more frequent basis  
12 than once in a while?

13 A Yes.

14 Q When was that?

15 A 2013 to 2014.

16 Q During that year, can you describe your  
17 consumption of alcohol?

18 A I know I would come home stressed from  
19 work and want to have a drink. I don't remember how  
20 often it was, but more than I usually drink. Not in  
21 excess, but more than I did.

22 Q How many drinks would you have when you  
23 would have them to relax?

24 A One, but more in a week than I would  
25 normally have.

1 Q You say that was during the 2013, 2014  
2 school year?

3 A Yes.

4 Q How old were you during the 2013, 2014  
5 school year?

6 A I am sixty-four now, so sixty-two.

7 Q Do you recall if you had consumed alcohol  
8 the night before the May 28th incident?

9 A I doubt it.

10 Q Why do you doubt it?

11 A I was very happy that day. I remember  
12 going into school and singing and fooling around in  
13 the classroom with one of the other teachers, I was  
14 very happy that day.

15 Q One of the issues that you described I  
16 think before as a result of your anxiety and  
17 depression was that you were vulnerable to panic  
18 attacks; is that correct?

19 A Yes.

20 Q Since September 2014 have you had a panic  
21 attack?

22 A Since September of 2014 have I had a  
23 panic attack?

24 Q Yes.

25 A Not that I recall.

1 Q Do you recall prior to our discussion in  
2 September 2014, do you recall the last time prior to  
3 that you had a panic attack?

4 A I had several before that time.

5 Q Do you recall approximately when those  
6 were?

7 A I had several during the school year.

8 Q When you say the school year, are you  
9 referring to the 2013, 2014 school year?

10 A Yes.

11 Q Did you have any panic attacks prior to  
12 what you and I know as the May 28th incident?

13 A Yes.

14 Q How many panic attacks do you think you  
15 had prior to May 28, 2014, during that school year?

16 A Several, I wouldn't know how to count  
17 them, but several.

18 Q Were all those panic attacks similar in  
19 terms of the symptoms and the physical feelings?

20 A Nothing like the last one, no, I would  
21 say.

22 MR. WOLIN: He is not asking you  
23 that. He is asking if all the ones prior  
24 were similar?

25 A The ones prior were panic attacks, not

1 full blown panic attacks.

2 Q Can you describe what you mean by a full  
3 blown panic attack?

4 A A full blown panic would be the one I  
5 would have to go home, I wouldn't be able to cope.

6 Q Are there physical symptoms that occur or  
7 that you notice when are you going through a full  
8 blown panic attack?

9 A A regular panic day attack would be the  
10 racing heart and not being able to catch your breath  
11 type of thing.

12 Q What is the difference between that and a  
13 full blown panic attack?

14 A A full blown panic attack I would assume  
15 you can't function --

16 MR. WOLIN: Nobody wants you to  
17 assume. I think your question is as far  
18 as she feels, not medically, right?

19 MR. SMITH: Right.

20 A The full blown one I felt ready to  
21 collapse. I had severe chest pains and I couldn't  
22 like, I just had severe chest pains, the migraine  
23 started from the back of my neck and went straight  
24 up, it was the worse pain I ever felt.

25 I had very bad migraines, but none like



1 that one. I was bending over, I couldn't keep my  
2 head up. My legs felt wobbly. I felt like I was  
3 going to collapse.

4 Q This attack, was this the attack that  
5 occurred on May 28th?

6 A Yes.

7 Q When you had the full blown panic attack,  
8 in addition to the physical symptoms you just  
9 described, how would you describe your train of  
10 thought while this attack was going on, would you  
11 describe yourself as clearheaded?

12 MR. WOLIN: Objection.

13 A I was hysterically crying.

14 Q Since September 2014 till today, have you  
15 consulted with any type of medical professional with  
16 regard to the panic attacks specifically?

17 A No.

18 Q Have you been hospitalized overnight  
19 since September 2014?

20 A No.

21 Q Have you visited an emergency room since  
22 September 2014?

23 A No.

24 MR. SMITH: Mark these documents.

25 (Whereupon, a packet of documents

1           were marked Defendant's Exhibit A for  
2           identification, as of this date.)

3           Q       I will hand you what has been marked as  
4           Defendant's Exhibit A. What I would like you to do  
5           is take a moment and look through that document.

6                   MR. SMITH: While you do, I will  
7           identify for the record that this is a  
8           document produced by Plaintiff date  
9           stamped McCarthy 23 through McCarthy 39.

10          Q       Do you recognize this document?

11          A       Yes.

12          Q       What is that document?

13          A       This is a notebook that I wrote.

14          Q       When did you write these notes?

15          A       When I called my union rep, right after I  
16          called my union rep.

17          Q       Do you recall when that was?

18          A       May 29th.

19          Q       Did your union rep suggest that you write  
20          these notes?

21          A       No, I don't think so.

22          Q       Was there something specific that  
23          prompted you to begin writing these notes on May  
24          29th?

25          A       No, I usually, when I want to remember

1 something, when I make phone calls or do anything  
2 like that I usually write things down.

3 Q Is that to help your memory recall --

4 MR. WOLIN: Objection.

5 A No, just to organize myself, because I  
6 don't like talking on the telephone.

7 Q Prior to May 29th had you ever written  
8 down notes or entries of any type regarding what was  
9 happening at work?

10 A No.

11 Q The document we have here, these pages,  
12 does this represent the entirety of all the notes  
13 you wrote?

14 A Yes.

15 Q Have you written any notes since this has  
16 been provided?

17 A No.

18 Q What I would like to do, I would like to  
19 go through and ask you about some of the things you  
20 wrote in here.

21 On the first page McCarthy 23, the very  
22 first entry, I will read it and we will discuss it.  
23 It states, Jeff he called NYSET and said it was a  
24 slam dung, Braswell caused reaction to her medical  
25 condition, didn't call timely fashion.

1                   Could you explain what you meant by that  
2   entry?

3           A       I called Jeff Pullen, he is the union  
4   rep. He said he called NYSET, which is our union,  
5   and said that they said to him that the way that  
6   Braswell had talked to me caused my panic attack and  
7   that was cause for a lawsuit.

8                   And that because they called the police  
9   three hours after the incident that, you know, that  
10   it was not a fair thing to do. If they had been so  
11   concerned about me, it should have been in a more  
12   timely fashion.

13           Q       When this phrase, said it was slam dung,  
14   this is Mr. Pullen quoting someone from NYSET?

15           A       Yes.

16           Q       What do they mean by, this is a slam  
17   dung?

18                   MR. WOLIN: Objection.

19           A       No idea.

20           Q       When you were discussing this with  
21   Mr. Pullen, were you discussing a lawsuit, that a  
22   lawsuit would be a slam dunk?

23           A       I don't know, I just wrote down what he  
24   said to me.

25           Q       The next entry has a reference to call

1 Sylvia to get paperwork for a medical leave. Why  
2 were you calling someone to get paperwork for  
3 medical leave on May 29th?

4 A Because I didn't want to go back to  
5 school.

6 Q Were you advised by anyone that there was  
7 a medical reason why you were not able to go back to  
8 work?

9 A I felt I was --

10 MR. WOLIN: Answer his question, he  
11 said were you advised by anybody?

12 A Mr. Pullen said to me to get a medical  
13 leave if I felt that I wasn't able to go back to  
14 school.

15 Q At the time, did you feel that you were  
16 not able to go back to work?

17 A Yes.

18 Q Why did you feel you were not able to go  
19 back to work?

20 A I felt I was being bullied, I didn't  
21 think I had the strength to go back.

22 Q What do you mean when you say you didn't  
23 have the strength to go back?

24 A I felt I broke down. I didn't think I  
25 was able to withstand another month of that.

1           Q       The next entry, well, actually in that  
2 paragraph it also says, call hospital for records  
3 doctor to show existing medical condition. What did  
4 you mean by that?

5           A       Not sure, I don't remember that.

6           Q       Did you believe at the time there was  
7 something about an existing medical condition that  
8 was going to prevent you from being able to go back  
9 to work?

10          A       I truthfully I don't remember what it was  
11 for. It might have been --

12                   MR. WOLIN: If you don't remember,  
13 say you don't remember, then you are  
14 guessing.

15          Q       The next entry, call lawyer for lawsuit.  
16 Did someone advise you to call a lawyer?

17          A       Yes.

18          Q       Who did?

19          A       Jeff Pullen.

20          Q       In looks Article 26, Section B, what is  
21 that in reference to?

22          A       It says reprimand or discipline.

23          Q       Right, do you know what that means?

24          A       It was probably something Jeff told me to  
25 look up.

1 Q Do you know if this is an Article in your  
2 collective bargaining agreement?

3 A I don't know.

4 Q Below that is the contact information for  
5 your attorney Alan Wollin?

6 A Yes.

7 Q Was that provided to you by Jeff Pullen?

8 A Yes.

9 Q After you spoke to Jeff Pullen and he  
10 relayed the conversation he had with NYSET, do you  
11 know if the union did file a grievance on your  
12 behalf?

13 A I believe he filed a grievance against  
14 Mr. Braswell, yes.

15 Q Do you know if at any point in time he  
16 filed a grievance against Ms. Higgins?

17 A That I don't know.

18 Q Do you recall what the basis for that  
19 grievance was?

20 A The one that I am aware of was that he  
21 disciplined me in front of my peers.

22 Q On how many occasions had he disciplined  
23 you in front of your peers?

24 A That one, the incident.

25 Q This occurred at the meeting that

1 morning?

2 A Yes.

3 Q Do you recall how many people were  
4 present for that meeting?

5 A The whole first grade team and  
6 Ms. Higgins.

7 Q How many people total would that have  
8 been?

9 A Six people.

10 Q When you wrote these notes, did you write  
11 them all at once?

12 A No.

13 Q I believe you said you had begun writing  
14 on May 29th?

15 A Yes.

16 Q Did you then write them over a course of  
17 days?

18 A Yes.

19 Q At the time you were writing them, did  
20 you believe the recollections in these notes were  
21 accurate?

22 A Yes.

23 Q When is the last time you reviewed these  
24 notes?

25 A I'm not sure.



1 Q Did you review any documents to prepare  
2 for today's deposition?

3 A Yes.

4 Q What documents did you review?

5 A The two depositions that I did with you,  
6 with the County and school district.

7 Q The transcripts of your testimony?

8 A Yes.

9 Q When was that, that you reviewed those  
10 transcripts?

11 A Last night.

12 Q Did you meet with your attorney at all to  
13 prepare for today?

14 A Yes, yesterday.

15 Q For how long?

16 A Forty-five minutes.

17 Q I would like you to turn, if you could,  
18 to page stamped McCarthy 25. Do you recall when you  
19 wrote this entry?

20 A I don't remember when I wrote it, but I  
21 remember writing it.

22 Q With regard to this or any of the entries  
23 that are in this document, did anyone assist you in  
24 writing any entries?

25 A No.

1 Q Did anyone review these notes after you  
2 wrote them?

3 MR. WOLIN: Objection.

4 Q Did you provide these notes to anyone to  
5 review?

6 A No, I gave it to my lawyer when you  
7 wanted it for discovery.

8 Q In between the time when you wrote them  
9 and provided them to your attorney, did you share  
10 them with anyone?

11 A I think I might have read them to my  
12 daughter.

13 Q Did your daughter have any suggestions as  
14 to things you should change in these notes?

15 A No.

16 Q After providing them to your Counsel, I  
17 am not asking about conversations with your Counsel,  
18 but subsequent to that time, have you shared them  
19 with anyone else, other than your Counsel?

20 A No.

21 Q At anytime has anyone reviewed or  
22 commented on them?

23 A No.

24 Q Before you gave them to your Counsel did  
25 you edit them in any way?

1 A No.

2 Q You wrote them --

3 A You can tell how sloppy it is they --

4 MR. WOLIN: All right, just answer  
5 the question.

6 Q On to page twenty-five, you don't recall  
7 exactly when you wrote this entry, whether it was on  
8 May 29th or another day, correct?

9 A Correct.

10 Q Going to the next page McCarthy 26.  
11 There is a, I can't tell you how many lines down,  
12 right around the middle you will see an entry and it  
13 states I was and then there is just a line.

14 A Word retrieval.

15 MR. WOLIN: He didn't ask you a  
16 question, he made a comment.

17 Q It is about eleven lines up, you see  
18 that?

19 A Yes.

20 Q When you say the word retrieval, at the time  
21 you couldn't think of the word you wanted to use?

22 A Yes.

23 Q Looking at it now, do you know what the  
24 word was you were trying to think of at the time?

25 A I still can't think of what the word was,

1 I was pushing her away.

2 MR. WOLIN: He is asking if you know  
3 the word?

4 A No.

5 Q The next page, page twenty seven, you  
6 state at one point you described that you were  
7 having the worst migraine I ever experienced. Do you  
8 see that?

9 A Worst migraine I ever experienced.

10 Q You see that?

11 A Yes.

12 Q This is referring to the migraine that  
13 occurred on May 28th, correct?

14 A Correct.

15 Q Then you state, the psychologist showed  
16 up next to me and told me to calm down, too late,  
17 was already having panic attack.

18 First of all, do you recall the name of  
19 the psychologist that showed up next to you?

20 A Swinkin.

21 Q Where were you when you were having this  
22 migraine and panic attack?

23 A I walked down the hallway, I was at the  
24 end of the hallway and she showed up on my left  
25 side.

1 MR. WOLIN: When you say she?

2 A Ms. Swinkin was on my left side, my  
3 friend Julie came out, we entered.

4 Q What is Julie's last name?

5 A Scandaglia.

6 Q You state here that your friend Julie,  
7 they placed you in a wheelchair at that time,  
8 correct?

9 A Yes.

10 Q They wheeled you into the psychologist's  
11 office?

12 A No, the nurse's office.

13 Q When they wheeled you into the nurse's  
14 office, can you describe what the nurse's office  
15 looked like?

16 A It is a small room. It has, actually, it  
17 is a larger room, but it was curtained off, there  
18 were curtains in the back.

19 I was in the open part of the room where  
20 the two hallways connect. I was closest to the  
21 door. I wasn't really in, in the nurse's office, I  
22 was more in the doorway, where the doorways connect.

23 Q When you say the doorways connect, what  
24 doorways are you talking about?

25 A There is an outside doorway, from the

1 hallway you go in a door and there's a little bit of  
2 a hallway to get into the nurse's office and another  
3 hallway connects the main office to the nurse's  
4 office and I was in that area right there.

5 Q Do you recall this nurse's office, are  
6 there windows in the office?

7 A Yeah.

8 Q How many?

9 A There's like three large ones, but that  
10 is further back. And there's a little tiny nurse's  
11 office where she has her own closed door and  
12 computer and things over to the right.

13 Q When Ms. Swinkin and Ms. Scandaglia  
14 wheeled you into this office, was the nurse there?

15 A No.

16 Q Was anyone there besides Ms. Swinkin and  
17 Ms. Scandaglia?

18 A No.

19 MR. WOLIN: Can we take a break.

20 (Whereupon, there was a pause in the  
21 proceeding.)

22 Q Sticking to page twenty-seven for a  
23 moment. You state in the middle of the page when  
24 you are referring to your friend Julie came and got  
25 a wheelchair for you, you claim that she or they got

1 your pocketbook to get your medicine for you; do you  
2 recall that?

3 A Yes.

4 Q What medicine?

5 A The breakthrough medicine.

6 Q Did you take it at that time?

7 A Yes.

8 Q What form is that in?

9 MR. WOLIN: Objection.

10 A It is in a capsule.

11 Q How many capsules do you take per --

12 A Two.

13 Q Do you have any idea of what the dosage is  
14 of that capsule, the milligrams or anything like  
15 that?

16 A No.

17 Q Would that information be, for example,  
18 on the label of the bottle?

19 A I don't know.

20 Q Do you have any records that you know of  
21 that would indicate the dosage of that medication  
22 or for any of the other medications you take?

23 A Yes.

24 Q You took two pills at that time, correct?

25 A Yes.

1 Q You had taken all your other medication  
2 that morning, correct?

3 A Yes.

4 Q Do you recall whether, did the dosage,  
5 did the breakthrough medicine work?

6 A No.

7 MR. WOLIN: Objection.

8 Q At some point, did you take a second dose  
9 of the breakthrough medicine that day?

10 A No.

11 Q Going to the bottom of that page, you  
12 state I kept repeating how all these months Braswell  
13 has been bullying me and causing such stress, I was  
14 sick every night. Who was in the room when you were  
15 saying this?

16 A There was people coming in and out of the  
17 room, Swinkin was in the room, I know that for  
18 sure, because she sat with me the entire time. That  
19 is the only person I can say absolutely was there.

20 Q Were there other people that were there  
21 part of the time?

22 A Yes.

23 Q Who would that be?

24 A The nurse at one time was there.

25 Ms. Higgins was there at one time. Ms. Beno was in



1 and out. Julie was in and out.

2 Q At the time you made these statements  
3 about Mr. Braswell bullying you and being sick every  
4 night, do you recall specifically who was in the  
5 room?

6 A I don't recall.

7 MR. WOLIN: She did indicate at least  
8 one person was in the room at all times.

9 THE WITNESS: Yes, Ms. Swinkin.

10 Q Ms. Swinkin was sitting with you,  
11 correct?

12 A Yes.

13 Q Were you in the wheelchair the whole  
14 time?

15 A Yes.

16 Q At any point did you move to another  
17 seat?

18 A No.

19 Q Where was she sitting in relation to you?

20 A To my left.

21 Q What did you mean when you said you were  
22 sick every night?

23 A Because of the constant put downs I, and  
24 the children having all of the problems that they  
25 were having, I was stressed and felt demoralized

1 every night coming home from work.

2 Q Did you feel physically sick?

3 A It made me physically sick, yes.

4 Q In what way?

5 A My stomach hurt, I was fatigued, I was  
6 depressed.

7 Q On the nights when your stomach hurt and  
8 you were fatigued, were these the evenings you were  
9 consuming one drink or so to relax?

10 A No, those were the nights I just went to  
11 bed early.

12 Q On the nights you were sick you would not  
13 drink?

14 A Right.

15 Q It says here you were sick every night?

16 A Okay, yes.

17 Q The next statement says you had a Xanax  
18 in your purse?

19 A Yes.

20 Q Did you take the Xanax at that time?

21 A Yes, I was encouraged by Ms. Swinkin to  
22 take it.

23 Q Do you recall any other occasions prior to  
24 this that you took both the breakthrough medication  
25 and the Xanax at the same time?

1 A No.

2 Q Have you ever consulted with a doctor  
3 about taking those two medications at the same time?

4 A No.

5 Q This issue of you feeling sick every  
6 night, how long had that been going on prior to this  
7 incident?

8 A Almost the whole school year.

9 Q Did you ever seek any sort of medical  
10 help for that?

11 A No.

12 Q Do you still feel sick every night?

13 A No.

14 Q When did that stop?

15 A Beginning of September 2014.

16 Q Between May 28th and September of 2014,  
17 between that time, were you sick every night?

18 A I was depressed, I wasn't sick.

19 Q Do you still feel depressed at night now?

20 A No.

21 Q On page twenty-eight, the next page, nine  
22 lines down you state, I started screaming at the top  
23 of my voice, get away from me, I am going to have a  
24 nervous breakdown. Do you recall doing that in the  
25 room?

1 A Yes.

2 Q Do you recall who was in the room when  
3 you screamed that?

4 A The teacher that was yelling in my ear, I  
5 recall her, the substitute teacher.

6 Q It was a substitute teacher yelling in  
7 your ear?

8 A Yes.

9 Q What was her name?

10 A I didn't know her, so I don't recall her  
11 name.

12 Q What was she yelling?

13 A St. Louis was her name, don't know for  
14 sure. She had started the whole process, the reason  
15 for the meeting was she had brought the meeting on.  
16 She was telling me how sorry she was.

17 It seemed to me at the time she was  
18 yelling. I said get away from me, you are yelling  
19 in my ear, get away from me.

20 Q You said it seemed to you at the time she  
21 was yelling, had you come to learn since she was  
22 actually not yelling?

23 A No.

24 Q You believe she was yelling in your ear?

25 A Yes.

1 Q Were there other individuals present when  
2 she was yelling in your ear?

3 A Ms. Swinkin, maybe Ms. Higgins, I really  
4 don't know who else was there.

5 Q When you screamed, get away from me, were  
6 you screaming that at her, or at everyone in general?

7 A At her.

8 Q Is there a reason why you didn't mention  
9 in these notes that she had been screaming in your  
10 ear?

11 MR. WOLIN: Objection, you can  
12 answer.

13 A No. I wasn't trying to write --

14 MR. WOLIN: Answer the question, you  
15 said no.

16 Q When you wrote down these notes, what is  
17 the purpose of writing these notes?

18 MR. WOLIN: Objection, she answered,  
19 you can answer again.

20 A I was just writing down what happened.  
21 There was no purpose really, to cleanse myself.

22 Q Did you review them after you wrote them  
23 to see if there were details that you left out?

24 A No.

25 Q Screaming at the top of your voice,

1 telling one or more people that you were going to  
2 have a nervous breakdown, was that something  
3 unusual for you to do?

4 MR. WOLIN: Objection, you can  
5 answer.

6 A I wasn't screaming at everybody, I was  
7 screaming at her. And, yes, it's unusual for me to  
8 be like that.

9 Q Emotionally when this was going on, were  
10 you crying, were you upset?

11 A Yes, the entire time I was at the school  
12 I was crying.

13 Q Later only at the bottom of that page you  
14 state that you were telling someone in the room that  
15 when Dr. Right was the principal, she knew and cared  
16 about health and family. And she knew you had  
17 depression and had panic attacks and you took  
18 medication for it?

19 A Yes.

20 Q Do you recall who you told that to?

21 A Ms. Higgins was in the room then,  
22 Swinkin, the nurse. I think that was all in the  
23 room at that time.

24 Q Would you agree that after making that  
25 statement everyone who heard you in the room would

1 now also be aware you suffered from depression, had  
2 panic attacks and took medication?

3 MR. WOLIN: Objection.

4 A Yes.

5 Q When you were making these statements,  
6 were you still emotionally upset?

7 A Yes.

8 Q Were you still crying?

9 A Yes.

10 Q You mentioned a few people in the room at  
11 the time you made the statements, where were they in  
12 relation to you?

13 A Ms. Higgins was to my right, Ms. Swinkin  
14 still to my left and Ms. Chester was behind me.

15 Q Prior to this on the same page you state  
16 the psychiatrist was asking you questions. Do you  
17 recall what questions she asked you?

18 A She asked me what medicine I was taking,  
19 did I need to take more medicine. I said, no, I  
20 took just enough. Then she just told me I should go  
21 home, I said I know, I need to go home and lie down.

22 Q Moving on to next pain, page twenty nine,  
23 you state, I believe you are quoting the  
24 psychiatrist at this time, she said I wish you would  
25 calm down and stop shaking; do you see this?

1 A Yes.

2 Q Were you physically shaking at that time?

3 A I don't recall.

4 Q Then you say, I told her I would take a  
5 Xanax, did you mean Xanax or something different?

6 A Xanax.

7 Q Did you take one at that time?

8 A Yes.

9 Q Was this in addition to the one you took  
10 earlier?

11 A No.

12 Q How many Xanax pills did you take?

13 A One.

14 Q I started to calm down, so do you recall  
15 the Xanax calming you down?

16 A Yes.

17 Q You then go on to say, we talked about  
18 how it was when Dr. Right was there. I told her a  
19 long time ago I had a hard class and I told her if  
20 she didn't help me, I was going to jump out the  
21 window. The joke was I was on the ground floor.

22 Higgins asked if I would ever hurt  
23 myself, I said, of course not, I have a family I  
24 love to take care of, I would never hurt them like  
25 that. Do you recall writing that?



1 A Yes.

2 Q Do you recall making that statement in  
3 the room at the time?

4 A Yes.

5 Q Who was in the room when you made that  
6 statement?

7 A I would think the same people.

8 Q Where were they standing in relation to  
9 you when you made this statement?

10 A Same places.

11 Q This is after you had started to calm  
12 down as a result of the Xanax?

13 A Yes.

14 Q In terms of your tone of voice, were you  
15 speaking in a softer tone than you had been prior?

16 MR. WOLIN: Objection.

17 A I believe I was calmer.

18 Q When you said this, were you looking  
19 specifically at one of the individuals in the room?

20 A I believe I was talking to Ms. Higgins.

21 Q After you made this statement, did anyone  
22 other than Ms. Higgins comment on it?

23 A No.

24 Q Sitting here today, are you certain that  
25 everyone in the room heard the entirety of what you

1 said?

2 MR. WOLIN: Objection.

3 A Yes.

4 Q How could you be certain of that?

5 A I was speaking in a normal voice.

6 Q Did you ask everyone at any point, either  
7 that day or subsequent, whether they heard  
8 everything that you said?

9 A No.

10 Q I believe you stated earlier that  
11 there were people coming in and out of the room,  
12 some only there for parts of the time, correct?

13 A Yes.

14 Q At the time you made this specific  
15 statement, are you sitting here today with absolute  
16 certainty as to who was in the room for the entire  
17 time or is it possible people were coming in and out  
18 as you described earlier?

19 MR. WOLIN: When you say the entire  
20 time, the entire time in the room or  
21 making this statement.

22 MR. SMITH: Making the statement.

23 A At this time there were no more people  
24 coming in and out.

25 Q Who exactly was in the room?

1 A Swinkin, the nurse and Ms. Higgins.

2 Q At any point subsequent to May 28th, have  
3 you ever been asked whether on the day you had made  
4 comments, even casually about hurting yourself?

5 A I don't understand the question.

6 Q Subsequent to May 28th you've met with  
7 different people who asked you questions about that  
8 day, correct?

9 A Like you?

10 Q Like myself.

11 A Okay.

12 Q Had you also met with a doctor who asked  
13 you questions about that day?

14 A Dr. Solomon.

15 Q Did Dr. Solomon ask you questions about  
16 what you might have said to people that day while in  
17 the office?

18 A Yes.

19 Q Do you recall whether or not you told him  
20 about this statement?

21 A I said I absolutely did not say I was  
22 going to hurt myself.

23 Q Did you tell him about this statement at  
24 all?

25 MR. WOLIN: Objection.

1 A I don't recall.

2 Q According to you and your notes, this  
3 statement it was a joke you had made to a prior  
4 previous principal, correct?

5 A Yes.

6 Q At the time you made the statement to the  
7 people in the room on May 28th, did you explain to  
8 all of them it had all been a joke?

9 MR. WOLIN: Objection.

10 A Yes.

11 Q How exactly did you tell them that it had  
12 been a joke?

13 MR. WOLIN: When you say it had been  
14 a joke --

15 MR. SMITH: The statement to jump out  
16 a window.

17 A It was in reference to having the  
18 principal know us intimately, knowing everybody's  
19 family, know what we were about.

20 I had a rough class, I said, Dr. Right  
21 you have to help me out with a child otherwise I  
22 will jump out the window. I said Dr. Right, you  
23 know I am on the first floor, and everybody laughed.  
24 She thought I was so funny, I said it like that and  
25 I said it was a joke.

1 Q Moving on, Ms. Higgins did ask you  
2 whether or not you were serious, correct?

3 A Yes, she did.

4 Q According to here, you said, of course  
5 not, I have a family I love to take care of, I would  
6 never hurt them like that?

7 A Yes.

8 Q Is that what you recall saying to Ms.  
9 Higgins at that time, that you wouldn't hurt  
10 yourself because you didn't want to hurt your  
11 family?

12 MR. WOLIN: Objection.

13 A I would never hurt myself and I would  
14 never hurt anyone.

15 Q When Ms. Higgins asked you if you  
16 seriously would hurt yourself, how come you just  
17 didn't tell her, oh, I was joking?

18 MR. WOLIN: Objection.

19 A I might have said that.

20 Q That is not what is in these notes,  
21 correct?

22 MR. WOLIN: Objection.

23 MR. SMITH: What is the objection?

24 MR. WOLIN: Notes speak for  
25 themselves.

1           A       I didn't write this as a statement to  
2   what I said verbatim, I just wrote down my thoughts  
3   of that day. I didn't know this was going to be  
4   used as anything in Court or anything like that. I  
5   wouldn't think I put down everything I said.

6           Q       We looked at six pages so far. In the  
7   review we've done so far, have you recognized  
8   anything that was left out, that you left?

9           A       I could go back and rewrite it all.

10           MR. WOLIN: Just answer the question.

11           A       Would you repeat the question?

12           Q       In terms of these notes, specifically  
13   with regard to the notes of the recollection of the  
14   events of May 28th, we've now looked at a few pages  
15   in which you recounted these events, while we  
16   recounted them, has anything occurred to you that  
17   were not in the notes that you recall recurring that  
18   day?

19           MR. WOLIN: Objection.

20           A       I could probably clean them up a little.

21           MR. WOLIN: He is not asking you  
22   that.

23           A       Yes.

24           Q       What is not in the notes that you recall  
25   happening that day?

1 MR. WOLIN: She already testified to  
2 some things, didn't we already have  
3 testimony about that --

4 MR. SMITH: I am asking about one  
5 item.

6 MR. WOLIN: You are asking her what  
7 is in there, she already identified what  
8 is in there.

9 MR. SMITH: Your client testified  
10 these are not verbatim recollections.  
11 I want to make sure that if we were going  
12 to use these as any sort of a  
13 recollections of that day, I know the full  
14 scope.

15 Q While we have been talking has anything  
16 occurred to you that you recall happening that is  
17 not in these notes?

18 A Yes.

19 Q What?

20 A I would have to go back over every page  
21 and really look through it.

22 Q Okay, you can do that.

23 A I believe the word I was trying to  
24 remember was ostracizing the blank that I left out  
25 was ostracizing.

1 MS. BEN-SOREK: For the record on  
2 page twenty-six?

3 THE WITNESS: Yes.

4 A Ms. Higgins, instead of saying she on  
5 page twenty-eight, it should be Ms. Higgins kept  
6 stressing that I should go to my sister's and rest  
7 and forgot about everything, she is Ms. Higgins.

8 And I put the joke was that I was on the  
9 ground floor, so I had mentioned to them that it was  
10 a joke. Higgins asked if I would ever hurt myself,  
11 I said, no, of course not.

12 I said I live with my family, I would  
13 never hurt them like that. That was in addition to  
14 my not hurting myself, you know what I am saying, it  
15 is two different statements.

16 I said, no, of course not, I would never  
17 do that, I have a family that I love and I take care  
18 of and I would never hurt them like that.

19 Q Anything else?

20 MR. WOLIN: Do you want to go through  
21 the whole document?

22 MR. SMITH: No, just up until that  
23 point.

24 Q After you have the phrase hurt them like  
25 that, there is an arrow down, do you know what that arrow



1 meant?

2 A No.

3 Q On page thirty, about mid-way down this  
4 is according to your notes, the police had arrived at  
5 your sister's house.

6 You state they said the school dropped  
7 the ball, because I left the school three hours  
8 before and if they thought there was a danger, they  
9 shouldn't have let me leave, never mind my chest  
10 pains and migraine.

11 First of all, who was it that told you  
12 the school dropped the ball?

13 A The police officer.

14 Q How many police officers arrived at your  
15 house?

16 A Two.

17 Q Which officer made the statement?

18 A The male.

19 Q Was there one male and one female?

20 A Yes.

21 Q Other than that statement, did you have  
22 any discussion with him on where he elaborated on  
23 how the school dropped the ball?

24 A He said there was something very wrong in  
25 what was going on here.

1 Q The phrase, drop the ball, is that a  
2 phrase he used or --

3 A He used.

4 Q Was it the same officer that said it  
5 seemed like someone was trying to harass you?

6 A The way I wrote it, yes.

7 Q Just going back to that phrase before  
8 that, never mind about my chest pains and migraine,  
9 what did you mean by that sentence?

10 A No one seemed concerned that I had chest  
11 pains or anything physical. They called up and  
12 wanted to put me in the psychiatric ward, I didn't  
13 understand that.

14 Q At any point before you had left the  
15 school building that day, had you told anyone that  
16 physically you needed medical attention?

17 A I kept telling them that my chest, that I  
18 had trouble breathing and my chest was hurting me  
19 and I couldn't stand the pain in my head.

20 Q Did you ask anyone to call a doctor for  
21 you?

22 A No.

23 Q When your sister picked you up, did you  
24 ask your sister to call a doctor for you?

25 A No.

1 Q Did anyone suggest you needed to go to  
2 the hospital for these chest pains and physical  
3 pains?

4 A I did not ask to go to the hospital at  
5 all.

6 Q They didn't ask you and you didn't ask  
7 them, correct?

8 A No.

9 Q At the end of the page you refer, you  
10 say, I spoke to the nurse in charge. After speaking  
11 to me and listening to my story, told me to call my  
12 union leader. This is the nurse in charge at the  
13 hospital, correct?

14 A Correct.

15 Q Do you remember the name of that nurse?

16 A No.

17 Q Can you describe the nurse physically?

18 A No.

19 Q Was it a man or woman?

20 A Woman.

21 Q Taller or shorter than you?

22 A She was sitting down.

23 Q How long had you been in the hospital  
24 when you had this conversation with her?

25 A I don't know.

1 Q On the next page, page thirty-one about  
2 four or five lines down, when I finally got to the  
3 doctor she said she was sorry I had to go through  
4 this for nothing, clearly someone was using this as  
5 a punishment. She also said call the union and file  
6 a lawsuit. Do you recall the name of that doctor?

7 A No.

8 Q Can you describe that doctor physically?

9 A She wore a turban.

10 Q When you spoke to that nurse, how long  
11 had you been at the hospital when you spoke to that  
12 nurse?

13 A I don't recall.

14 Q Had you been there more than an hour?

15 A About an hour.

16 Q When you spoke to this doctor, how long  
17 had you been at the hospital?

18 A About four or five hours. No, about six,  
19 seven, almost seven and a half hours.

20 Q When you spoke to either the nurse or the  
21 doctor in charge, you were accounting the events of  
22 the day, correct?

23 A Yes, they asked me.

24 Q Do you recall whether you told either of  
25 them that you had told people in the room about this

1 joke you had made about jumping out of the window?

2 A I don't recall.

3 Q Moving on to page thirty-two at the top  
4 of this page, it states June 3rd, Tuesday, would  
5 that indicate the date you made these notes or --

6 A I don't know.

7 Q The entry, asked Jeff about sick leave  
8 papers online, because Sylvia isn't returning my  
9 calls. Does that refresh your recollection if you  
10 thought of this on June 3rd or just the date you  
11 wrote it down?

12 A I don't know.

13 Q The sick leave papers you were going to  
14 ask Jeff about, are those the medical leave papers  
15 you had referenced earlier in those notes?

16 A Yes.

17 Q Is it fair to say at the point you wrote  
18 this you were still considering taking some sort  
19 of medical leave from work?

20 A Yes.

21 Q Had anyone at this point, do you recall  
22 this was subsequent to your discharge from the  
23 hospital, correct?

24 A Yes.

25 Q At the time you were still considering

1 taking that medical leave, what was the medical  
2 basis you believe you had for taking that leave?

3 MR. WOLIN: Objection, you keep  
4 saying medical leave, she keeps saying  
5 sick leave, I don't know if there is a  
6 difference between medical leave and sick  
7 leave.

8 Q Why did you think you needed to go out on  
9 sick leave.

10 A I didn't think I could stand the stress  
11 anymore of what I was being subjected to at school.

12 Q Earlier in these notes you had referred  
13 to asking a doctor --

14 A June 3rd I was already out of school.

15 Q It is your recollection now that these  
16 notes refer to something you were thinking about on  
17 June 3rd?

18 A No.

19 Q On the first page of this document you,  
20 this is page twenty-three, you refer to a call  
21 hospital for records for doctors showing an existing  
22 medical condition, do you see that?

23 A Yes.

24 Q What was the existing medical condition  
25 you were thinking about?

1 MR. WOLIN: Objection, asked and  
2 answered, you asked her that already.

3 Q Days later when you were contemplating  
4 asking Jeff, I assume that is Jeff Pullen, this is  
5 on page thirty-two at the top?

6 A They had already taken me out of school.

7 MR. WOLIN: There is no question.  
8 She is already out of school by then, that  
9 is what she is trying to say.

10 A Dr. Wortham already released --

11 Q Then what sick leave papers online are  
12 you referring to there?

13 A That is old, that is the next day after.

14 Q That is why I asked about the June 3rd  
15 date, and you said you didn't know.

16 A I didn't know that had anything to do  
17 with that, it is old.

18 Q Ask Jeff if sick leave papers are online,  
19 this is referring to something you thought about on  
20 May 29th? It was sometime earlier on June 3rd?

21 A Yes.

22 Q At that time, I am just retreading a  
23 little of what I asked about from that first page,  
24 when you were thinking at this time about taking  
25 some sort of leave from work, was it based upon an

1 existing medical condition?

2 A It was based on how I was feeling at that  
3 time.

4 Q Is it fair to say at the time you were  
5 feeling that you may not be able to actually go to  
6 work?

7 MR. WOLIN: Objection, you can  
8 answer.

9 A At that very day, yes.

10 Q Now the very next entry states, 9/13  
11 right their doctor look at me, came, have with me my  
12 doctor friend Jeff. Do you know what you meant by  
13 that entry?

14 A Yes, that next day they sent me a paper  
15 saying that I had to go for a 913. A 913 means I  
16 have to be evaluated by the school psychiatrist in  
17 order to get my job back.

18 I am allowed to take a friend with me or  
19 someone with me, that is what Jeff said, that is why  
20 the name Jeff is there.

21 Q The next entry, a big shake down on  
22 Thursday this could all go away, getting rid of  
23 bullies. What did you mean?

24 A Jeff had called and said that there was a  
25 lot going on at Roosevelt. That the people on the



1 board were not happy with Dr. Wortham and were not  
2 happy with things going on in our school building.

3 And they were considering getting rid of  
4 Dr. Wortham and Mr. Braswell.

5 Q When you say getting rid of bullies, are  
6 you referring to Dr. Wortham and Mr. Braswell?

7 A That is what he was referring to, yes.

8 Q At the time, did you consider Dr. Wortham  
9 to be a bully?

10 A I was starting to believe that she was  
11 involved.

12 Q Involved in what?

13 A In what was going on at the school.

14 Q What was going on at the school, what do  
15 you mean by that?

16 A That Mr. Braswell wasn't the only one  
17 causing the upsetment [SIC] at the school.

18 Q What do you mean by the upsetment at the  
19 school?

20 A The overcrowded classrooms. The not  
21 having the professional development and all those  
22 things.

23 Q Overcrowded classroom and lack of  
24 professional development, are these issues that  
25 other teachers were experiencing besides yourself?

1 MR. WOLIN: Objection.

2 A I don't know, I can only speak for  
3 myself.

4 Q Have you ever spoken to other teachers,  
5 other first grade teachers, for example, about those  
6 issues.

7 A Other first grade teachers, yes.

8 Q Did they ever express to you they feel  
9 they needed more professional development?

10 A Yes.

11 Q Did any other teachers ever express to  
12 you that school had a problem because they have  
13 overcrowded classes?

14 A Just the first grade teachers.

15 Q The other first grade teachers did?

16 A Yes.

17 Q Are they the same teachers you identified  
18 for me?

19 A No, not that year.

20 Q Who were the first grade teachers that  
21 year?

22 A First grade teachers that year were  
23 Ms. Y-E-D-I-N and Ms. B-E-N-O and Ms. Washington and  
24 Ms. Gonzales.

25 Q Ms. Yedin, what was her race?

1 A Jewish.

2 Q White?

3 A Yes.

4 Q Do you recall her age at that time?

5 A She is my age.

6 Q How about Ms. Beno?

7 A Ms. Beno is Caucasian and a little bit  
8 younger than me.

9 Q Is she over forty?

10 A Yes.

11 Q How about Washington?

12 A Ms. Washington and Miss Gonzales are the  
13 bilingual class, so they weren't really involved in  
14 the same issues, she is young.

15 Q Her race?

16 A Black.

17 Q And Ms. Gonzales?

18 A Spanish, she is very young.

19 Q What happened to Ms. Yedin and Ms. Beno  
20 that they weren't teaching the first grade the  
21 following year?

22 MR. WOLIN: Objection.

23 A Ms. Beno was teaching the following year,  
24 2013, 2014. Ms. Yedin was moved to fourth grade.

25 And Ms. Washington was moved to fourth grade I think

1 also.

2 Q When you refer to getting rid of bullies,  
3 you mentioned Dr. Wortham and Mr. Braswell, did you  
4 consider Ms. Higgins to be a bully as well?

5 A You only asked me about what that  
6 statement was, that is what I was answering to.

7 MR. WOLIN: I think she was referring  
8 to a conversation that Mr. Pullen had  
9 said.

10 Q Did Mr. Pullen tell you that they were  
11 getting rid of the bullies?

12 A Yes.

13 Q Who did he identify as the bullies they  
14 were getting rid of?

15 A I only wrote down what he said, that's  
16 all I wrote.

17 Q You told me since then, how do you know  
18 he was referring to Dr. Wortham and Mr. Braswell?

19 A I know it was Mr. Braswell, because that  
20 is who our conversations were about, that was the  
21 whole conversation.

22 Q I just want to make sure we are clear.  
23 You told me a minute ago you wrote down what he  
24 said?

25 A Right.

1 Q There is nothing in here that  
2 specifically identifies Mr. Braswell or Dr. Wortham.  
3 If they weren't written down here, do you still  
4 recall that is who he told you about in that  
5 conversation?

6 A Yes.

7 Q Did he mention any other administrators  
8 at that time that were bullies, who might be going?

9 A He probably mentioned Ms. Higgins also.

10 Q Do you recall if he mentioned any  
11 administrators from any other building in the  
12 district?

13 A No.

14 Q The Board of Education, apparently a big  
15 shake down is coming and the only three people they  
16 mention is the three Defendants in this lawsuit?

17 MR. WOLIN: Objection.

18 A The only three people he would talk to me  
19 about would be the people that were involved with  
20 me, I wasn't there to gossip.

21 Q Why would he bring this up in the first  
22 place?

23 MR. WOLIN: Objection.

24 A Because we were in conversation almost  
25 the whole summer.

1           Q       It then states, he already filed  
2       yesterday against Braswell, talk to Wortham about  
3       three hour delay, she had no knowledge, ha, ha.  
4       What are you referring to there?

5           A       He filed a grievance, that is what I told  
6       you about before. Jeff talked to Wortham, she said  
7       she had no knowledge of the 911 call that was  
8       a three hour delay in them calling.

9                   I wrote ha, ha, because she had to have  
10      known, she is the superintendent.

11          Q       Are you referring to the Dr. Wortham?

12          A       Yes.

13          Q       How do you know she had to have knowledge  
14      of that?

15          A       Well, if you are the superintendent of  
16      the school district you have to have knowledge. She  
17      was a very hands-on person.

18          Q       Is it your understanding the decision to  
19      call 911 was something that was clear with her  
20      beforehand?

21                   MR. WOLIN: Objection, you can  
22      answer.

23          A       Yes.

24          Q       Would anybody have been able to make that  
25      call without clearing it with her beforehand, as far

1 as you know?

2 MR. WOLIN: Objection.

3 A That is not to my knowledge.

4 Q What do you mean that is not to your  
5 knowledge?

6 A How would I know that?

7 Q That is my question. Going down, Joy  
8 came in and said parenthetically as if everybody  
9 knew about the 911 call, that she didn't make the  
10 call.

11 When she tried to call Lynn and tell her  
12 about the police coming, Braswell said put the phone  
13 down and don't give her a heads up. Who is Joy?

14 A Joy Emanuel she was the social worker at  
15 our school, she got transferred.

16 Q Was she present in the nurse's office on  
17 May 28th?

18 A No, she was not.

19 Q Was she someone you had a relationship  
20 with?

21 A She was the social worker at the school,  
22 yes, I had a lot of problem children, so, yes, I saw  
23 her frequently.

24 Q When it says, Joy came in and said, where  
25 was she when you had this conversation?

1 A In my classroom.

2 Q This happened when you were --

3 A No, when I came back.

4 Q When was it that you came back?

5 A In September I guess.

6 Q The notation in the margin, Tuesday,

7 June 3rd, that has nothing to do --

8 A I don't think so, no.

9 Q When she came into your classroom that  
10 day in September, had you asked to come in to  
11 discuss this issue?

12 A No.

13 Q Can you explain a little more on exactly  
14 what you mean here, what exactly did she come in and  
15 say?

16 A She came in and told me that, she came in  
17 and I had people in my classroom, so it wasn't like  
18 she, she came in openly and wasn't like speaking to  
19 me softly.

20 She came in like it was common knowledge  
21 that everybody knew the 911 phone call was made and  
22 the whole school talking about it. She said you  
23 know that I didn't make that call, the 911 call.

24 She said, but I did try and call your  
25 sister and give her a heads up when I heard that



1 they did that. I was trying to call to tell you  
2 that the police were coming.

3 Braswell heard me and said, put down the  
4 phone, don't give her the heads up.

5 Q This occurred in your classroom sometime  
6 in the following September, correct?

7 A Yes.

8 Q You said there were other people in your  
9 room?

10 A Yes, I don't recall who they were.

11 Q Was it during the school day?

12 A Yes.

13 Q Were there students in the room?

14 A No, it was in the morning.

15 Q That would be other teachers?

16 A Yes.

17 Q Other first grade teachers?

18 A Probably.

19 Q She came in and told you everyone in  
20 September was taking about the 911 call that had  
21 been made in May?

22 A No, no, I said she acted like everyone  
23 knew about it, because she was saying it loudly,  
24 like it was a common known thing.

25 Q Did you ever have any conversations with

1 anyone else that was present in the nurse's office  
2 on May 28th about the call to 911?

3 A No. Well, my friend Nanette.

4 Q When did you talk to Nanette about this?

5 A I talk to her all summer long.

6 Q She was in the room on May 28th, correct?

7 A She was in the room on May 28th, yes.

8 Q When you talked to her about what had  
9 occurred in the room, did you ask her about who had  
10 made the call to 911?

11 A No.

12 Q What did you talk about with regard to  
13 May 28th?

14 A No, just how upset I was, it was just  
15 girl talk, we're friends.

16 Q Did you ever ask Ms. Higgins about the  
17 call to 911?

18 A No.

19 Q Did you ever ask Ms. Swinkin about the  
20 call to 911?

21 A No.

22 Q Did you ask the nurse about the call to  
23 911?

24 A No.

25 Q Did you speak to any of those individuals

1 about the events of May 28th?

2 A The other day I talked to the nurse, the  
3 nurse asked me some questions, other than that, no.

4 Q The other day just recently?

5 A Yes.

6 Q What questions did she ask you?

7 A She just asked me if I was continuing  
8 with the nonsense.

9 Q What do you mean nonsense?

10 A This, the lawsuit, she thought I should  
11 give it up.

12 Q Where were you when you had this  
13 conversation?

14 A In my classroom doorway.

15 Q What is the nurse's name?

16 A Ms. Chester.

17 Q Was anyone else present when you had this  
18 conversation?

19 A No.

20 Q Was that the first time you and Ms.  
21 Chester spoke about the lawsuit?

22 A Yes.

23 Q Have you had any other conversations with  
24 any other employees in the district about your  
25 lawsuit?

1           A       Ms. Swinkin came to me when I first came  
2 back and she said, you know that I don't want to be  
3 involved in any of this and you know that, I forgot  
4 how she said it. They wanted her to write down  
5 something that she didn't want to write down, but  
6 she is not tenured, so they forced her to sign a  
7 paper she wasn't happy with.

8                   She came and gave me a hug and said you  
9 know I didn't want to do that.

10          Q       What paper are you referring to that she  
11 wasn't happy with?

12          A       Some statement that she had to make.

13          Q       She told you that the statement was  
14 false?

15          A       That, you know, it wasn't true, that she  
16 knew I didn't do anything.

17          Q       She told you at some point that it was a  
18 false statement?

19          A       Yes.

20          Q       Where were you when she told you?

21          A       In my classroom.

22          Q       Was anyone else present?

23          A       No.

24          Q       Was this in September of the following  
25 school year?

1 A Yeah.

2 Q Did she tell you why she had signed a  
3 false statement?

4 A They were pressuring her.

5 Q Who is they?

6 A She didn't say, I assume Braswell.

7 Q On page thirty-three, the entry e-mailed  
8 emergency discharge papers. Do you know what that  
9 is referring to?

10 A No.

11 Q There has been an entry that looks like  
12 it has been covered up, do you know what that said?

13 A No.

14 Q Do you know why you would have crossed  
15 out an entry in your notes?

16 A It must have been nothing. It wasn't  
17 anything that was important, I see Monday there.

18 Q The rest of the page, am I just correct,  
19 it looks like there is writing there, but is that  
20 just an imprint from the page before? Was there  
21 writing there that just isn't legible, do you know?

22 A No, I don't know.

23 Q Do you know if in the original notes  
24 there is additional writing on that page that is  
25 legible?

1           A       This was my granddaughter's notebook --  
2                   MR. WOLIN: He asked you a question.

3           A       I don't know.

4           Q       Do you still have the original notes?

5           A       I don't have, no.

6           Q       Did you give your original notes to your  
7 Counsel?

8           A       Yes.

9           Q       On the next page, page thirty-four, at  
10 the bottom of the page there is an entry, it states  
11 6:30 p.m., do you see that?

12          A       Yes.

13          Q       Would that indicate the time of this  
14 conversation?

15          A       That seems possible.

16          Q       There is an entry in the margin ahead of  
17 that, Monday June 9th. Would that refer to the date  
18 you had these conversations?

19          A       That looks like, called Sylvia, Monday  
20 June 9th call Sylvia.

21          Q       On this page the Monday June 9th refers  
22 to the entry?

23          A       They were my notes, they were rambling, I  
24 don't know.

25          Q       In that entry, beside the notation 6:30,

1 you state you are quoting a conversation you had  
2 with Jeff Pullen.

3 A Yes.

4 Q You state, he told Braswell I didn't even  
5 want to go for the grievance, but he pushed it and  
6 thought it was a good idea. Do you recall not even  
7 wanting to go for the grievance?

8 A Yes.

9 Q Why did you not want to file a grievance?

10 A I am the type of person that likes to get  
11 along with everybody. I don't like to cause  
12 trouble. I like to go in and do my job and be  
13 friends with everybody.

14 This whole episode is very, very  
15 stressful. It is not my personality to do this. I  
16 didn't want to cause any more problems. I just  
17 didn't want this to happen to anyone else. This  
18 whole thing should never have happened.

19 For him to say, well we have another  
20 thing on him. I didn't think it was necessary, but  
21 he said it is necessary, because he did something  
22 else wrong and we don't want that to happen to  
23 somebody else either.

24 That is my personality, I don't want all  
25 of this. I am not trying to be mean or evil. This

1 lawsuit has to do with not letting anybody else  
2 have to go through what I went through.

3 Q When Mr. Pullen said he did something  
4 wrong to you, what was he referring to?

5 A He humiliated me in front of my peers.

6 Q By that you mean the statement he made at  
7 the meeting on May 28th?

8 A Right, right.

9 Q Did the grievance have anything to do  
10 with the call to 911 or anything that came after  
11 that?

12 A No, no, as far as I know.

13 Q Do you know what the outcome of that  
14 grievance was?

15 A No.

16 Q Do you know the outcome today?

17 A No, nobody told me anything.

18 Q Were you ever asked to give a statement  
19 with regard to that grievance?

20 A No.

21 Q On page thirty-four going into  
22 thirty-five, it looks like you are quoting what  
23 Mr. Pullen is quoting his conversation with  
24 Mr. Braswell.

25 Just so we have the full record I will



1 read, Braswell said he never said anything to me  
2 that would cause me to be upset and that I came into  
3 the meeting upset.

4 He said he would never say I did not care  
5 about children. Jeff said that was strange, since  
6 fifteen other people had the same story as me and  
7 his story was the only different one. Do you know  
8 the fifteen people Jeff was referring to?

9 A No.

10 Q I believe you testified earlier that  
11 there was six people in that meeting that morning,  
12 correct?

13 A Yes.

14 Q So the fifteen is not accurate, correct?

15 A No.

16 Q Did you recall if you corrected Jeff at  
17 that time and told him there was no way there could  
18 have been fifteen witnesses?

19 A No, I probably just wrote fifteen.

20 MR. WOLIN: I don't think, let me  
21 object. I don't think that the  
22 attribution here is that there were  
23 fifteen other people particularly in that  
24 meeting.

25 Q What do you think this means?

1 MR. WOLIN: Objection, we are  
2 speculating. He doesn't say there were  
3 people in that meeting, we are  
4 speculating.

5 Q According to your notes, Jeff told you  
6 that he thought Mr. Braswell's comment was strange,  
7 since fifteen other people had the same story as  
8 you, that's what you wrote, correct?

9 A Right.

10 Q Do you know what he meant by that?

11 A I'm not sure.

12 Q The only thing he quotes above is what  
13 happened at the meeting, correct?

14 A As far as the meeting goes, no, there  
15 wasn't fifteen people at the meeting.

16 Q Do you recall your conversation with Jeff  
17 at that time, when he told you that there were  
18 fifteen other people with the same story, do you  
19 recall if you ever corrected him, because you knew  
20 there couldn't have been fifteen other witnesses?

21 MR. WOLIN: Objection.

22 A No.

23 Q In the midst, in the context of filing a  
24 grievance and putting together this case, it would  
25 have been important for you to be accurate about the

1 number of witnesses?

2 MR. WOLIN: Objection.

3 A Again, this is not a statement I gave to  
4 the Courts.

5 MR. WOLIN: All of your questions are  
6 assuming something that we don't know,  
7 which is speculation.

8 That Jeff is saying there were  
9 fifteen people at the meeting, it doesn't  
10 say that, it doesn't say there were  
11 fifteen people at the meeting.

12 The premise of all of these questions  
13 is so far afield.

14 MR. SMITH: No, it is not actually,  
15 because the notes are her account of a  
16 conversation she had with someone.

17 I am asking her about the  
18 conversation, the notes are a reflection  
19 of that conversation.

20 MR. WOLIN: You are assuming that  
21 by him saying fifteen people, there were  
22 fifteen people at the meeting, it doesn't  
23 say that.

24 Q Do you recall when he said fifteen people  
25 what he meant by that?

1 A I don't remember.

2 Q In the middle of that page there is a  
3 statement, he said he was really worried about me,  
4 he cares about all of his teachers and that  
5 statement there is a box drawn around that.

6 Do you recall why you draw a box around  
7 that statement?

8 A Yes, because I felt that was a very  
9 untrue statement.

10 Q This is referring to Braswell, correct?

11 A Yes.

12 Q The next statement says, Jeff said he is  
13 very paranoid, he thinks the teachers are out to get  
14 him. Later on Jeff said they could have been  
15 talking about him being a psycho?

16 A Yes.

17 Q Where were you when you had this  
18 conversation when he referred to Mr. Braswell as  
19 paranoid and psycho?

20 A Where was I?

21 Q Was this a phone conversation?

22 A Yes.

23 Q Was anyone else on the phone during this  
24 conversation?

25 A No.

1 MR. WOLIN: As far as she knows.

2 Q As far as you know?

3 A No.

4 Q Did you agree with Mr. Pullen that Mr.  
5 Braswell is paranoid and psycho or do you agree with  
6 that assessment?

7 A I have no, I think he is mean.

8 Q Do you think he is mean generally to  
9 teachers?

10 MR. WOLIN: Objection.

11 A I think he has his own agenda.

12 Q What is that agenda?

13 A I don't know.

14 Q During the school year where you felt he  
15 was bullying you, did you feel he was bullying you  
16 because of that agenda?

17 A Yes.

18 Q Did he bully other teachers because of  
19 that agenda?

20 MR. WOLIN: Objection.

21 A I don't know.

22 Q Did you ever speak to any other teachers  
23 who also voiced concerns about the way he acted?

24 A Just the first grade team.

25 Q Do you normally speak to any other

1 teachers outside of the first grade team about  
2 issues at work?

3 A I try not to, I try and stay in my room  
4 and do the best job I can for my kids.

5 Q Since September 2014, when I first asked  
6 you questions, have there been any other occasions  
7 when you believe Mr. Braswell has bullied you?

8 A No.

9 MR. WOLIN: Objection, I think you  
10 asked that already.

11 MR. SMITH: No, I asked about  
12 discrimination, now I am asking about  
13 bullying in general.

14 Q Have there been any occasions since  
15 September 2014 when you believe Ms. Higgins has  
16 bullied you?

17 A No.

18 Q Do you believe that during the 2013, 2014  
19 school year Ms. Higgins was also bullying you?

20 A Yes.

21 Q Do you believe she was also bullying you  
22 as part of Mr. Braswell's agenda?

23 A Yes.

24 Q But you don't know what that agenda was?

25 MR. WOLIN: Objection.

1 A No.

2 Q On page thirty-six towards the bottom of  
3 the page there is an entry, lawyer called said to  
4 call school and say that I can't make appointment  
5 for Thursday, just got paper late last night.

6 Called Patty Duresco (phonetic) left message. Do  
7 you recall what this is referring to?

8 A I had called him to tell him that I had  
9 just gotten papers from the school, because they  
10 wanted me to go to the psychiatrist out in Port Jeff  
11 and I had just gotten them.

12 He told me to call the school and to tell  
13 them, you know, that I had gotten it so late.

14 Q Is that what you told the school?

15 A I told them that I couldn't make it. I  
16 was really upset about going to this, I thought I  
17 was losing my job. I thought they were trying to  
18 get rid of me.

19 I told them that, is this the first one,  
20 I had an appointment. It said if you had an  
21 appointment or something you could change it.

22 I said I had an appointment, but really I  
23 needed my daughter make an appointment, so she could  
24 meet with me and go with me.

25 Q The next line, it's crazy Dr. Solomon is

1 school district's henchman. When you say here, you  
2 are referring to your attorney, correct?

3 A Probably, yes.

4 Q Do you recall what you understood that to  
5 mean, Dr. Solomon is the school district's henchman?

6 A Usually when they want to get rid of  
7 teachers, they send them out to him. He is usually  
8 the one who tell people, you know, they find  
9 something wrong with the teacher and you are usually  
10 out.

11 Q At some point you did have an appointment  
12 with Dr. Solomon, correct?

13 A Yes.

14 Q Would it be fair to say that when you  
15 went to that appointment, your understanding was  
16 that if you said the wrong thing your job might be  
17 in jeopardy?

18 MR. WOLIN: Objection.

19 A No, I really thought my job was probably  
20 going to be terminated, because that is what that  
21 meeting was about.

22 Q Who told you that is what that meeting is  
23 about?

24 A It said on the paper, if you are not past  
25 by this paper, what was the whole process about.



1 Q Would it be fair to say when you went to  
2 that examination with Dr. Solomon, you were  
3 concerned about keeping your job?

4 A Yes.

5 MR. SMITH: Nothing further.

6 EXAMINATION BY LIORA M. BEN-SOREK, ESQ.:

7 Q Good afternoon, Ms. McCarthy. My name is  
8 Liora Ben-Sorek, I am a Deputy County Attorney. We  
9 met once before when I took your examination  
10 pursuant to the general municipal law 50H. Do you  
11 recall that?

12 A I do.

13 Q I gave you a set of instructions then at  
14 the deposition and I will just briefly go through  
15 them. They are pretty much the same as what  
16 Mr. Smith had given you earlier.

17 I will ask you a series of questions  
18 related to the lawsuit you brought against the  
19 County of Nassau, Nassau County Police Department,  
20 Police Officer Joseph Stassi, Officer Monique  
21 Amodeo, and the Advance Medical Technician, Matthew  
22 Field.

23 If at any time you don't understand or  
24 you can't hear my question, please tell me, I can  
25 rephrase it or speak louder. If you answer my

1 question, I will presume you understand it.

2 A Okay.

3 Q Just as with Mr. Smith, there are certain  
4 rules that we have to abide by for the court  
5 reporter. We have to wait for each other to finish  
6 our questions and our answers before we speak.

7 I like it reading as a conversation or  
8 reading play and you are reading the script and you  
9 see dot, dot, dot and the next person tries to  
10 figure it out. It winds up as a messy transcript if  
11 we don't allow each other to complete our statement.

12 The court reporter is not allowed to  
13 interpret what a nod of a head or gesture is, so you  
14 have to articulate all of your responses, okay?

15 A Okay.

16 Q We have been here for a couple of hours,  
17 is there any medication that you need to take or  
18 haven't taken today that you are required to take?

19 A No.

20 Q Referring to Exhibit A, Defendant's  
21 Exhibit A, I believe we finished off somewhere  
22 around page thirty-six. I will ask you to go back,  
23 for instance, to page thirty-four.

24 A Okay.

25 Q When you see page thirty-four in the

1 left-hand margin there are dates and remarks to the  
2 right of that. That is pretty much going through to  
3 the end of the document at page thirty-nine.

4 A Yes.

5 Q As you sit here today, is it your  
6 recollection that the dates in the left-hand margin  
7 refer to the entry that is to the right?

8 A I believe I started to at the end of this  
9 to write the dates in.

10 Q The document itself on pages twenty-three  
11 through thirty-nine would that have been in  
12 chronological order?

13 For instance, the entries pages  
14 twenty-three to thirty-three, to the extent they may  
15 or may not have dated entries, would all of that  
16 information be occurring prior to June 6th, which  
17 is the date at the top of page thirty-four?

18 A I would think so. I wouldn't want to  
19 swear to it, but I would say, yes, probably.

20 Q When you wrote down this journal of  
21 sorts, did you skip around pages or you wrote page  
22 after page in the order that they appeared in the  
23 blank pages in the book?

24 A I believe I wrote in the blank pages in  
25 the book, yes.

1           Q       The version of the document that you  
2       turned over to your attorney, was that still bound  
3       in the book or pages had been removed?

4           A       They was bound in the book.

5           Q       You referred within the context of  
6       Exhibit A, you referred to grievances that were  
7       filed against the school Defendants.

8                   In Exhibit A there was mention that Jeff  
9       Pullen had filed a grievance regarding Mr. Braswell?

10          A       Yes.

11          Q       Were their grievances filed on your  
12       behalf against any other civil officials in  
13       connection with incident of May 28, 2014?

14          A       Not that I know of.

15          Q       Did the grievances filed against  
16       Mr. Braswell mention in any manner anything having  
17       to do with the call to the police?

18          A       Not that I know of.

19          Q       Were any grievance filed by you or on  
20       your behalf against school officials in connection  
21       specifically with the fact that the police were  
22       called or the timing of when the police were called?

23          A       Not that I know of.

24          Q       Other than in the context of a formal  
25       grievance and in the context of the civil

1 litigation, was there any other manner in which you  
2 could have filed a complaint or a letter related to  
3 the events of May 28, 2014?

4 MR. WOLIN: Objection, you can answer  
5 it.

6 A I don't know.

7 Q Let me rephrase. In this action you  
8 filed a Notice of Claim?

9 A Right.

10 Q The Notice of Claim was putting the  
11 school district and the County on Notice about your  
12 intentions of filing a lawsuit?

13 A Yes.

14 Q There were separate Notices of claim for  
15 the school district and the County?

16 A Yes.

17 Q You filed a lawsuit which named both the  
18 school district and the County, correct?

19 A Yes.

20 Q You had a grievance filed against  
21 Mr. Braswell?

22 A Yes.

23 Q Was there any formal or informal  
24 complaint that you filed or had filed on your behalf  
25 whether that be the school board or to the principal

1 or to anyone?

2 A No.

3 MR. WOLIN: Off the record.

4 (Whereupon, a discussion was held off  
5 the record.)

6 MR. WOLIN: By Counsel, as is  
7 indicated on page three and four of the  
8 Verified Complaint, there was a charge of  
9 discrimination filed with the Equal  
10 Employment Opportunity Commission against  
11 the District Defendants, which I believe  
12 is responsive to the question.

13 Q Do you recall that filing with the EEO  
14 your attorney just referred to?

15 A Yes.

16 Q As you sit here today, do you know what  
17 the outcome of that filing was?

18 A No.

19 Q That filing as stated by your attorney  
20 related to a claim of discrimination, correct?

21 A Yes.

22 Q Did you review that filing before it was  
23 sent to the EEO?

24 A Yes.

25 Q To your recollection was there any

1 mention of the call to the police or the timing of  
2 the call to the police?

3 A I don't recall.

4 Q At the time you were at the nurse's  
5 office on May 28th did you ever make a statement to  
6 the effect your headache was so bad it felt like you  
7 were dying or you rather die?

8 A No.

9 Q There came a time on May 28, 2014 that  
10 you left the school, correct?

11 A Yes.

12 Q You were picked up by your sister?

13 A Yes.

14 Q And her boyfriend was in the car with  
15 her?

16 A Yes.

17 Q Did you have a conversation about what  
18 had transpired at the school during the car ride?

19 A Yes.

20 Q Do you recall the sum and substance of  
21 the conversation you had with your sister at the  
22 time?

23 A It wasn't with my sister, it was with my  
24 sister's boyfriend. My sister drove my car home, I  
25 drove with him.

1 Q Do you recall what the sum and substance  
2 of the conversation you had with Mr. Drinkwater?

3 A I believe I was crying said they were  
4 being mean to me and my head hurt really bad.

5 Q Do you recall what, if anything, that  
6 Mr. Drinkwater stated to you?

7 A He told me to calm down and not to cry.

8 Q Did you ask him to take you to a doctor  
9 or to a hospital?

10 A No.

11 Q Did he offer to take you to a doctor or a  
12 hospital?

13 A No.

14 Q I don't recall if Mr. Smith had asked you  
15 this, had there ever been a time you had a migraine  
16 that required you to leave work?

17 A No.

18 Q Was there ever a time that you left the  
19 school ill and you had to be picked up by someone  
20 prior to May 28, 2014?

21 A I don't think I was ever picked up by  
22 anyone.

23 Q Is it fair to say that it was an unusual  
24 occurrence for you to be picked up or that the  
25 school would have to call someone to bring you home?



1 A Yes.

2 Q It would be unusual for you to leave the  
3 school in the middle of the day?

4 MR. WOLIN: Objection, you can answer  
5 it.

6 A I had left on occasion if I was sick, but  
7 it is unusual, yes.

8 Q On the other occasions you left when you  
9 were sick, was that with a headache or something  
10 else?

11 A Something else.

12 Q Had you ever left the school early prior  
13 to May 28, 2014 due to stress related or anxiety  
14 related conditions?

15 A No.

16 Q Had you ever left the school due to  
17 anything related to your depression you have been  
18 treated for?

19 A No.

20 Q Early on in your testimony you were asked  
21 which medications you had been prescribed, you  
22 mentioned Topamax, Zoloft, Lipitor and Fiorinal,  
23 correct?

24 A Yes.

25 Q You later testified based on Exhibit A

1 that you also had Xanax?

2 A Yes.

3 Q You had Xanax in your pocketbook as well?

4 A Yes.

5 Q Do you recall what the dosage level --

6 A Point twenty-five.

7 Q Is that milligrams?

8 A I don't know, the smallest amount you can  
9 take.

10 Q On May 28th how many Xanax did you take?

11 A One.

12 Q Other than Xanax was there any other  
13 medication that was prescribed to you that you would  
14 take on a regular basis on May 28, 2014?

15 A The allergy medicine, it's got a real  
16 long name I never remember it.

17 Q How often do you take that?

18 A Once a day.

19 Q Do you still take that medication?

20 A Yes.

21 Q Same medication?

22 A Yes.

23 Q Has there been any change in the dosage?

24 A No.

25 Q Is it taken daily?

1 A Yes.

2 Q Do you recall for what type of allergy  
3 you take it?

4 A It is seasonal.

5 Q I will leave a line in the transcript you  
6 can fill it in.

7 (INSERT)

8 MR. WOLIN: That is fine.

9 Q That is taken regularly or as needed?

10 A Regularly.

11 Q Is there any medication that was  
12 prescribed to you as of May 28, 2014 other than the  
13 Fiorinal and the Xanax that you would take on an as  
14 needed basis?

15 A No.

16 Q Did there come a time that you had a  
17 conversation with your sister regarding the events  
18 of May 28, 2014 at the school?

19 A When I got to her house.

20 Q Who initiated that conversation?

21 A My sister probably asked me what  
22 happened.

23 Q Do you recall the sum and substance of  
24 what you had said?

25 A Basically that Mr. Braswell had accused

1 me of not loving my children, I had got upset. It  
2 started with a migraine, I wanted to come home and  
3 feel better.

4 Q At the time you arrived at your sister's  
5 home do you recall approximately what time of day it  
6 was?

7 A It was probably ten-thirty.

8 Q By the time you arrived at your sister's  
9 home do you recall the degree in which your migraine  
10 headache was effecting you?

11 MR. WOLIN: Objection, you can  
12 answer.

13 A It was still there.

14 Q With respect to the chest pains that you  
15 testified about, were you still experiencing them by  
16 the time you got to your sister's home?

17 A No, they were better.

18 Q Did there come a time that you expressed  
19 to your sister that Ms. Higgins had asked whether  
20 you had ever tried to hurt yourself?

21 A I don't recall.

22 Q When Ms. Higgins had asked you that  
23 question, did you inquire why she would even ask  
24 such a thing or what the basis was?

25 A I remember being a little indignant,

1 like, no.

2 Q Did you inquire what the basis for her  
3 remark was?

4 A No.

5 Q Was her remark or her question did it  
6 appear to you that her question was in response to  
7 your statement about being so stressed you would  
8 jump out a window?

9 MR. WOLIN: Objection.

10 A No, I think people would, if anybody is  
11 upset, they could ask something like that. I don't  
12 know, I really don't know.

13 Q Do you recall if Ms. Higgins' statement  
14 was made just after you had made that remark?

15 MR. WOLIN: Objection.

16 A Not sure.

17 Q There came a time that police officers  
18 responded to your sister's home?

19 A Yes.

20 Q Do you recall who those police officers  
21 were?

22 A It was a male and a female.

23 Q If I mentioned the names, Stassi and  
24 Amodeo, does that refresh your recollection?

25 A It does now.

1 Q Do you recall which was Stassi and which  
2 was Amodeo?

3 A Stassi was the male and Amodeo was the  
4 female.

5 Q Who answered the door?

6 A My sister.

7 Q Did you hear any colloquy between your  
8 sister and the police officers?

9 A No.

10 Q How did you become aware that the police  
11 were at the door?

12 A I was in the room next to the door and my  
13 sister yelled, Susan, the cops are here.

14 Q How did you know the cops were there for  
15 you?

16 A I didn't, she said they came in and they  
17 said Roosevelt School called and said we had to come  
18 and pick you up.

19 Q Did they say that to you or your sister?

20 A Well, we were both standing together in  
21 the kitchen.

22 Q Can you give me a description of the  
23 layout, the police came to the front door?

24 A The front door, the stairs going up, a  
25 landing and a kitchen. (Indicating)

1 Q Is it like a split level of sorts?

2 A Yes.

3 Q Your sister went to open the door?

4 A Yes.

5 Q Were you in the kitchen or someplace  
6 else?

7 A I was in the cat room.

8 Q The cat room is where in relation to the  
9 door?

10 A It is next to the door, the kitchen is up  
11 the stairs.

12 Q What precipitated you to leave the cat  
13 room when the police arrived?

14 A My sister said the police were here, I  
15 guess she invited them up the stairs. My sister  
16 has, my sister is rescue person. My sister had a  
17 rescue pit bull upstairs, which they were playing  
18 with him in the room, so I came out of the room.

19 Q When you say they were playing with him?

20 A The two police officers were playing with  
21 the dog.

22 Q What made you realize or believe that the  
23 police were there to speak with you, was it that you  
24 overheard --

25 A When I came out, they said Roosevelt had

1 called.

2 Q You came out of the room before the  
3 police officers mentioned they were there from  
4 Roosevelt?

5 A I believe so.

6 Q Did one officer speak or take the lead?

7 A Yes, the male.

8 Q When he made that remark that Roosevelt  
9 sent them, who responded, you or your sister?

10 A I believe I did.

11 Q Let me start with, what, if any,  
12 conversation did your sister have with the police?

13 MR. WOLIN: At any time during the  
14 entire encounter?

15 Q Let's start with, what, if any, colloquy  
16 did your sister have with the police when they  
17 arrived at first other than letting them in the  
18 house?

19 A I don't really know, I know what I said.

20 Q Did you observe any conversation between  
21 your sister and the officers between the time they  
22 arrived and the time you left the home?

23 A I know she wanted to come with me and she  
24 was very upset they were taking me. I don't know  
25 specifically what she said.



1 Q When you say she was upset, did she speak  
2 with you or the officers or someone else?

3 A I think she was just saying  
4 nonspecifically I am coming with you.

5 Q Did anyone tell her that she couldn't?

6 A They said you can't go with her. I said,  
7 no, Lynn, you stay here, don't get upset I will  
8 straighten this out.

9 Q When the police said they were sent there  
10 from the school district, what, if any,  
11 communications went back and forth between you and  
12 the officers occurred?

13 A I said that is ridiculous, why would they  
14 send an ambulance.

15 Q Was the ambulance there at that time?

16 A No, I'm sorry, I said why would they send  
17 the police.

18 Q What did they respond?

19 A They said there was a 911 call that I was  
20 going to hurt myself or someone else. No, I was a  
21 threat to myself or someone else.

22 Q Did you make any further inquiry?

23 A I got really upset at that point. I said  
24 I have a migraine, I said I need to be resting not  
25 being more agitated. I was just starting to feel

1 better and that was hours ago.

2 He looked at the sheet, his clipboard and  
3 he said something is not right here, that was over  
4 three hours ago.

5 Q At any time did the officers ask you  
6 questions about, from your perspective, what  
7 transpired at the school?

8 A I don't believe so.

9 Q At any time did the officers ask you what  
10 you may have said to anyone at the school?

11 A I don't believe so.

12 Q Did the officers indicate who called  
13 them, who made the phone call?

14 A I believe I asked, I said who would do  
15 such a thing. They said the name on here is Edith  
16 Higgins.

17 Q Did you have any further conversation  
18 about what Ms. Higgins told the police specifically?

19 A I said she was the one who told me to go  
20 to my sister's house to relax. I said why, if she  
21 was the one who told me to go to my sister's house  
22 to relax, why she would call the police three hours  
23 later, it doesn't make sense.

24 Q As you sit here today, did you come to  
25 learn the time line of events that had taken place

1 to lead to the phone call?

2 MR. WOLIN: Objection.

3 A No.

4 Q Did any of the officers provide you with  
5 more specifics with what the allegations were, other  
6 than saying they got a call that you were a threat  
7 to yourself or others?

8 A No.

9 Q At any time did you come to a realization  
10 that it could have to do with the remark of jumping  
11 out of the window that Ms. Higgins witnessed?

12 MR. WOLIN: Objection.

13 A No.

14 Q Did Officer Stassi ask you whether or not  
15 you intended to hurt yourself?

16 A I said to him, aren't you supposed to be  
17 able to assess a situation, if you come into a  
18 situation, you can see clearly I am not a threat to  
19 myself, this is when they were telling me I had to  
20 go.

21 I said you are going to take me against  
22 my will, clearly I have a migraine, I am here with  
23 my sister. He said things happen in other places  
24 where people are not what they seem.

25 I said I am telling you there is nothing

1 wrong with me and that is when he said we have to  
2 take you to the psychiatric unit. I said this is  
3 really getting crazy.

4 Q Did you have any conception or come to  
5 any conclusion as to why the officers were taking  
6 you to the psychiatric unit as opposed to a medical  
7 unit at the hospital?

8 MR. WOLIN: Objection.

9 A No. That didn't make any sense to me.  
10 He said to me himself he didn't understand why.

11 Q Did you have any communication with the  
12 female officer?

13 A She was very quiet.

14 Q Did she ask any questions of you?

15 A I was in my sister's nightgown and she  
16 wanted to follow me in and have me change in front  
17 of her. I was not happy about that.

18 Q Did you learn that was for safety  
19 reasons?

20 A Yes, and I was objecting to it.

21 Q At any time did you form an opinion or  
22 believe that having you sent to the hospital was --  
23 let me rephrase that.

24 Did you have a belief that the school was  
25 trying to intimidate you or provide cause for

1 perhaps some sort of personnel action?

2 MR. WOLIN: Objection.

3 A At first I couldn't figure out what, as  
4 it worn on I figured they were out, I don't know,  
5 something was wrong. I had no idea why they would  
6 do that to me.

7 Q Did you form an opinion or belief that  
8 the school was out to get you in some way?

9 MR. WOLIN: At that time?

10 Q On that day?

11 MR. WOLIN: Objection.

12 A On that day I was so confused I didn't  
13 know.

14 Q When you arrived at the hospital, did any  
15 of the medical staff, nurses, physician's assist,  
16 doctors, did they make any inquiry into any specifics  
17 of what transpired in the school, in other words,  
18 any specific conversations?

19 A I was there quite a while. It was very,  
20 very crowded that day, I was standing at a desk,  
21 because there was no seats.

22 I carried on a conversation with the  
23 nurse at the desk. She said why are you here, I  
24 told her what happened in the school, she said you  
25 shouldn't be here.

1 First of all, why didn't they address  
2 your physical needs, why were they so quick to do  
3 that. She went on to say about the time frame. She  
4 said you should call your union. She said it was  
5 ridiculous that they rushed to do this, we are so  
6 crowded here, we have all these patients who really  
7 need help.

8 That is what the other doctor that  
9 examined he said the same exact thing. This is  
10 punishment the schools do, we've seen it before. We  
11 are very sorry you had to suffer this unneeded  
12 embarrassment and harassment.

13 Q Prior to being examined at the hospital  
14 did anyone tell you the purpose of the psychiatric  
15 evaluation?

16 A No.

17 MS. BEN-SOREK: It is Plaintiff's  
18 Response to County's Defendants  
19 interrogatories notarized and verified on  
20 October 12, 2015.

21 Q Ms. McCarthy, I am showing you this, on  
22 page four or five of that document.

23 MR. WOLIN: You mean the last page  
24 and the verification page?

25 MS. BEN-SOREK: Correct.

1 Q There is a name Susan McCarthy; is that  
2 your signature?

3 A Yes.

4 Q Do you recall signing this document?

5 A Yes.

6 Q When you signed it, you reviewed it and  
7 checked for its accuracy?

8 A Yes.

9 Q You were satisfied it was accurate and  
10 you signed it?

11 A Yes.

12 Q Turn to page three, question four. It  
13 asks state with specificity the nature and type of  
14 injury alleged to have been sustained by the  
15 Plaintiff as a result of the facts alleged in the  
16 Complaint.

17 For each such injury set forth the amount  
18 of said alleged damages, the method for computing  
19 same and specify which of the Defendants is alleged  
20 to have caused same. And then a four paragraph  
21 response.

22 Showing you paragraph one, where it talks  
23 about I suffered lost of career opportunities,  
24 damage to my reputation, emotional distress,  
25 physical pain and suffering, attorney's fee,

1       embarrassment and ridicule.

2               With respect to that paragraph, what loss  
3       of career opportunities you are alleging occurred as  
4       a result of the incident specified in your  
5       complaint?

6           A       I feel like career opportunities, I don't  
7       want to go further in my career any more, I am ready  
8       to retire. I wanted to stay in my profession a lot  
9       longer than I do now. It has just been too  
10       stressful, too much of a strain.

11          Q       You say you wanted to go further, did you  
12       want to go further in terms of the number of years as  
13       a teacher or taking courses in administration or  
14       something of that nature?

15          A       Yes.

16          Q       With regard to taking, getting college  
17       credits, had you made any plans prior to May 2014 to  
18       do so?

19          A       No.

20          Q       Did you have any said idea of what type  
21       of college classes you wanted to take?

22          A       No.

23          Q       Was it in the education field or  
24       something else?

25          A       No, it was in the education field, I



1 didn't know what I was going to be doing.

2 Q I believe you said you just want to  
3 pretty much pack it up, paraphrasing, pack it up.  
4 Have you had a set retirement plan prior to  
5 May 2014?

6 A No.

7 Q You decided how many years you wanted to  
8 work?

9 A No.

10 Q As you sit here today do you have a time  
11 line of when you intend to retire?

12 A No.

13 Q As you sit here today do you intend to  
14 continue teaching next year?

15 A I don't know.

16 Q Have you discussed with anyone whether  
17 professionally or a friend or family member the  
18 reasons why you don't know if you are going to teach  
19 next year?

20 MR. WOLIN: Objection, you can  
21 answer.

22 A It is a very hard line, this has taken a  
23 lot out of me. I had a lot more, it has just taken  
24 a lot out of me the last two years.

25 Q Have you spoken to anyone about that?

1 A Family.

2 Q Who in your family have you spoken to?

3 A My daughter.

4 Q Which daughter?

5 A I have three.

6 Q Which daughter?

7 A My youngest and my middle daughter.

8 Q Their names?

9 A Melissa and Amy.

10 Q Have you spoken to any counselor or  
11 clergyman?

12 A No.

13 Q Social worker or psychiatrist?

14 A No.

15 Q Your sister?

16 A My sister.

17 Q What about Mr. Drinkwater?

18 A No, no.

19 Q You claim that your reputation has been  
20 damaged. Can you explain what the damage is to  
21 your reputation?

22 MR. WOLIN: Objection.

23 Q Is it something that is tangible, that  
24 you can point to?

25 A I don't know about tangible, but the

1 entire school knows what went on. I don't know if  
2 everybody knows what really went on. There is  
3 gossip and rumors and things like that.

4 Q Have people spoken to you about that day  
5 or that incident?

6 A They have tried to, yes.

7 Q When they have tried to, what do they try  
8 to do, engage in conversation or have --

9 A Yes, engage me in conversation.

10 Q Do they mention anything they may have  
11 heard?

12 A Yes.

13 Q What do they say, generally speaking?

14 MR. WOLIN: Objection, you can  
15 answer.

16 A Just they are asking me, you know, why,  
17 you know, why did Mr. Braswell put you in the psych  
18 ward, they call it the loony bin. They make all  
19 kinds of little comments.

20 Q Generally speaking, what was your  
21 response?

22 A I told them I don't want to talk about  
23 it.

24 Q Talk about physical pain and suffering.  
25 Can you explain what physical pain and suffering,

1 other than the migraine and the chest pains as a  
2 result of the incident of May 28th?

3 MR. WOLIN: Objection, other than  
4 what she has testified to. She testified  
5 to stomach pains and other symptoms.

6 Rather than limiting it, why don't  
7 you say other than what you testified to.

8 MS. BEN-SOREK: I will rephrase it.

9 Q As a result of the interaction with  
10 Officer Stassi and Officer Amodeo have you had any  
11 loss of career opportunities?

12 MR. WOLIN: Objection.

13 A I'm not sure.

14 Q You testified at the time the officers  
15 arrived at your sister's home there was no  
16 ambulance?

17 A No, not when they showed up.

18 Q An ambulance did come at some point?

19 A Yes.

20 Q That was an Ambulance Technician Field?

21 A Yes.

22 Q Did the ambulance technician ask you any  
23 questions about your well being?

24 A No.

25 Q Did he take any vital statistics, vital

1 signs?

2 A No.

3 Q Was there any conversation between you  
4 and the ambulance?

5 A I don't believe so.

6 Q Let me also include, have you suffered  
7 any loss of career opportunities as a result of any  
8 interaction you had with the ambulance technician?

9 MR. WOLIN: Objection.

10 A No.

11 Q What, if any, damage to your reputation  
12 are you alleging occurred as a result of Officer  
13 Stassi, Officer Amodeo and AMT Field?

14 MR. WOLIN: Objection.

15 A Being taken against my will to the  
16 psychiatric center.

17 Q Other than you and your sister, did  
18 anyone know at the time you were being taken to the  
19 psychiatric ward?

20 MR. WOLIN: Objection.

21 A The neighbors in my sister's  
22 neighborhood.

23 Q Who told the neighbors you were being  
24 taken to the psychiatric ward?

25 A Not the psychiatric ward, but that the

1 police had come to my sister's house and the  
2 ambulance was there.

3 Q Had you ever seen, prior to the 28th of  
4 May 20143, had you ever seen an ambulance arrive to  
5 assist anyone else within the Roosevelt, Freeport  
6 area?

7 A Probably, yes.

8 Q When you have seen those ambulances, have  
9 you also seen police cars?

10 A Yes.

11 Q Have you ever formed an opinion that  
12 something must have been wrong that the police and  
13 an ambulance were there, about those other people  
14 that you have seen?

15 A Yes.

16 Q In the next paragraph, four lines down,  
17 you state, as a result of the Defendant's actions I  
18 was falsely imprisoned, victim of assault and  
19 battery and suffered loss of liberty.

20 When you say you were falsely imprisoned,  
21 are you referring to the time you were taken to the  
22 hospital against your will?

23 A Yes.

24 Q Would you say that was suffering loss of  
25 liberty as well?

1 A Yes.

2 Q With respect to the victim of assault and  
3 battery, who assaulted you and battered you?

4 A Just being in that place with those  
5 people. There was a lot of people that were  
6 mentally unstable that I was locked in with.

7 Q When you say that place and that facility  
8 do you --

9 A That hospital.

10 Q Nassau University Medical Center?

11 A Yes.

12 Q Did anybody physically touch you?

13 A No, just verbally.

14 Q Who verbally, who did anything to you  
15 verbally?

16 A A gentleman that was in there.

17 Q Was the gentleman a patient?

18 A Yes.

19 Q What, if anything, did this gentleman do  
20 or say?

21 A He had a foot fetish and he was asking me  
22 to go home with him.

23 Q At that time that this other patient made  
24 that remark to you, was either the AMT or either of  
25 the police officers there?

1 A No.

2 Q They had already left?

3 A Yes.

4 Q They signed you in and left?

5 A Yes.

6 Q When you were interviewed by the medical  
7 staff at the hospital, did you indicate to them the  
8 colloquy that occurred at the nurse's office?

9 A I'm sorry?

10 Q When you were interviewed or evaluated by  
11 the staff at the hospital, did they, did you explain  
12 to them the colloquy that occurred at the nurse's  
13 office?

14 Did you try and explain what Dr. Wright  
15 had done, that it had been a joke and Ms. Higgins  
16 asked you if you would hurt yourself?

17 A I don't remember.

18 MS. BEN-SOREK: Let me take a minute.

19 (Whereupon, a discussion was held off  
20 the record.)

21 MR. WOLIN: The only thing I ask is,  
22 since we did refer to at least one of the  
23 Responses, the interrogatories that we  
24 mark it.

25 MS. BEN-SOREK: Here is the original,



1 we will mark that.

2 (Whereupon, Responses were marked  
3 Defendant's Exhibit B for identification,  
4 as of this date.)

5 Q Other than when the police mentioned that  
6 they received a call from Ms. Higgins at the school,  
7 as you sit here today are you aware of any other  
8 communication between any of the officers or AMT and  
9 any school district personnel related to you and the  
10 events of May 28, 2014?

11 A Could you repeat that again?

12 Q I will rephrase it. The police officers  
13 mentioned to you they received a call from  
14 Ms. Higgins on May 28, 2014, correct, when they came  
15 to your sister's home?

16 A Okay.

17 Q Other than that communication, as you sit  
18 here today, have you learned whether or not these  
19 said police officers, Amodeo and Stassi and the AMT  
20 had any other communications with the school  
21 district related to you?

22 A Yes.

23 Q What have you learned?

24 A They didn't know where my sister lived,  
25 so they went and questioned my friend and asked her

1 where my sister lived.

2 Q When did that occur?

3 A Not sure.

4 Q Is that before the officers went to your  
5 sister's home?

6 A Yes.

7 Q Do you know whether that communication  
8 was by telephone with the officers?

9 A No, Ms. Higgins, brought the police  
10 officers into her classroom.

11 Q Is it your understanding that the police  
12 officers received a call and they responded to the  
13 school, spoke with Ms. Higgins; is that correct?

14 A Yes.

15 Q Ms. Higgins brought them to your friend's  
16 classroom to find out your sister's address?

17 A Yes.

18 Q Which friend is that?

19 A Ms. Beno.

20 Q Ms. Beno provided your sister's address  
21 as far as you know to the police officers responding  
22 to your sister home?

23 A Yes.

24 Q Other than that communication with  
25 Ms. Beno and Ms. Higgins are you aware of any other

1 communications as you sit here today?

2 A No.

3 Q Are you aware of any media report or  
4 coverage related to you and your case in March 2014?

5 A Yes.

6 Q What media outlet was that?

7 A New York Post.

8 Q Do you know the name of the reporter?

9 A I did know it for a while, but I don't  
10 recall.

11 Q Are you aware of how the Post became  
12 aware of this story?

13 A From what I am told, it is the reporter  
14 that goes to the Courts and looks through the cases,  
15 the case reporter or whatever she is.

16 Q A female reporter?

17 A Yes.

18 Q Did this individual contact you?

19 A No.

20 Q Do you know who they contacted?

21 MR. WOLIN: Objection, if they  
22 contacted anybody.

23 A No.

24 Q Did you ever speak with that reporter?

25 A No.

1 Q Subsequent to the article being  
2 broadcast, published, did you contact the reporter  
3 of the New York Post?

4 A No.

5 MS. BEN-SOREK: Nothing further.

6 (Whereupon, the examination of this  
7 witness was concluded at 1:08 p.m.)

8 STATE OF NEW YORK )  
9 ) SS.:  
10 COUNTY OF )

11 I have read the foregoing record of my  
12 testimony taken at the time and place noted in the  
13 heading hereof and I do hereby acknowledge it to be  
14 a true and correct transcript of same.

15  
16 Susan McCarthy  
17 SUSAN MCCARTHY

18 Subscribed and sworn to before me  
19 this 4<sup>th</sup> day of March 2016.

20  
21 Jill A. Fierman  
22 Notary Public

23 JILL A. FIERMAN  
24 Notary Public, State of New York  
25 No. 4993075  
Qualified in Nassau County 2018  
Commission Expires March 9, 2018

1 INDEX

2

3 EXAMINATION OF BY PAGE

4 Susan McCarthy Mr. Smith 4-88

5 Ms. Ben-Sorek 88-123

6

7 EXHIBITS

8 DEFENDANT'S DESCRIPTION PAGE

9 A Packet of Documents 24

10 B Interrogatories 119

11

12 INFORMATION TO BE SUPPLIED

13 DESCRIPTION PAGE

14 Complete list of medications 14

15 Type of allergy taking medication for 98

16

17

18

19

20

21

22

23

24

25

1 C E R T I F I C A T I O N

2

3 I, SUSAN DEGENNARO, a Notary Public for and  
4 within the State of New York, do hereby certify:

5 That the testimony in the within proceeding  
6 was held before me at the aforesaid time and place.  
7 That said witness was duly sworn before the  
8 commencement of the testimony, and that the  
9 testimony was taken stenographically by me, then  
10 transcribed under my supervision, and that the  
11 within transcript is a true record of the testimony  
12 of said witness.

13 I further certify that I am not related to  
14 any of the parties to this action by blood or by  
15 marriage, that I am not interested directly or  
16 indirectly in the matter in controversy, nor am I  
17 in the employ of any of the counsel.

18 IN WITNESS WHEREOF, I have hereunto set my  
19 hand this 25th day of January, 2016.

20

21

22

23

24

25

  
SUSAN DEGENNARO



Re: Testimony of Susan McCarthy taken on January 8, 2016

ERRATA SHEET

PAGE	LINE	CORRECTION	REASON
14	3	Alprazolam Atorvastatin Levocetirizine Aspirin Butal-ASA-Caff Sertraline Topiramate	
26	24	slam dunk	
27	13	slam dunk	
27	17	dunk	
30	5	Wolin	
45	15	Dr. Wright	
46	22	pain	
47	18	Dr. Wright	
51	22	Dr. Wright	
55	7	forget	
109	9	me	

Susan McCarthy  
SUSAN MCCARTHY

Sworn to before me this 4<sup>th</sup>  
day of March, 2016

Jill Sieman  
Notary Public

Page 1 of 1

JILL A. SIEMAN  
Notary Public, State of New York  
No. 4082015  
Qualified in Nassau County 2018  
Commission Expires March 3, 2018

A		
<p>a.m 1:18 abide 89:4 ability 6:5 able 6:8 23:5,10 28:7,13,16,18,25 29:8 63:5 69:24 106:17 absolute 49:15 absolutely 39:19 50:21 account 82:15 accounting 59:21 accuracy 110:7 accurate 6:25 31:21 80:14 81:25 110:9 accurately 6:5,9 accused 98:25 acknowledge 123:13 acted 72:22 84:23 action 1:5 11:19 92:7 108:1 125:14 actions 117:17 addition 24:8 47:9 55:13 additional 76:24 address 4:9 109:1 121:16,20 administration 111:13 administrators 68:7,11 Advance 88:21 advise 29:16 advised 17:10 19:9,16,21 28:6,11 affect 19:10 afield 82:13 aforesaid 125:6 afternoon 88:7 age 8:25 9:3 11:20 13:6 66:4,5 agenda 84:11,12,16,19 85:22,24 ages 11:5 agitated 104:25 ago 15:8 47:19 67:23 105:1,4 agree 45:24 84:4,5 AGREED 3:3,8,12 agreement 30:2 ahead 77:16 Alan 2:5 30:5 alcohol 19:19,22,24 20:11,17 21:7 allegations 106:5 alleged 110:14,15,18,19 alleging 111:3 116:12 allergy 97:15 98:2 124:15 allow 89:11 allowed 63:18 89:12 altered 14:21 ambulance 104:14,15 115:16,18,20 115:22 116:4,8 117:2,4,13 ambulances 117:8 Amodeo 1:11 2:10 88:21 100:24 101:2,3 115:10 116:13 120:19 amount 97:8 110:17 AMT 116:13 118:24 120:8,19 Amy 113:9 answer 5:2,10,12,19,25 8:15,21</p>	<p>12:5 13:8 28:10 34:4 44:12,14,19 45:5 53:10 63:8 69:22 88:25 92:4 96:4 99:12 112:21 114:15 answered 6:15 44:18 62:2 101:5 answering 67:6 answers 89:6 anxiety 15:15 21:16 96:13 anybody 17:10 28:11 69:24 79:1 100:10 118:12 122:22 anymore 61:11 anytime 33:21 anyway 19:10 apparently 68:14 appear 100:6 appeared 90:22 applied 13:4,5 appointment 86:4,20,21,22,23 87:11,15 approximately 11:1 22:5 99:5 area 37:4 117:6 arrive 117:4 arrived 56:4,14 99:4,8 102:13 103:17,22 108:14 115:15 arrow 55:25,25 article 29:20 30:1 123:1 articulate 5:2 89:14 aside 10:9 asked 46:17,18 47:22 50:3,7,12 52:15 55:10 59:23 60:7 62:1,2,14 62:23 67:5 71:10 74:3,7 77:2 79:18 85:5,10,11 95:14 96:20 98:21 99:19,22 105:14 119:16 120:25 asking 18:19 22:22,23 33:17 35:2 46:16 53:21 54:4,6 61:13 62:4 82:17 85:12 114:16 118:21 asks 110:13 assault 117:18 118:2 assaulted 118:3 assess 106:17 assessment 84:6 assigned 9:20 assist 32:23 108:15 117:5 assistant 7:24 8:5 ASSOCIATES 2:14 assume 6:1 23:14,17 62:4 76:6 assuming 82:6,20 attack 21:21,23 22:3 23:3,8,9,13 23:14 24:4,4,7,10 27:6 35:17,22 attacks 21:18 22:11,14,18,25 23:1 24:16 45:17 46:2 attention 57:16 attorney 2:7 4:17 30:5 32:12 33:9 87:2 88:8 91:2 93:14,19 attorney's 110:25 attorneys 1:21 2:3,14 3:4 attribution 80:22 Avenue 2:16</p>	<p>aware 30:20 46:1 101:10 120:7 121:25 122:3,11,12</p> <p><b>B</b></p> <p>B 29:20 120:3 124:10 B-E-N-O 65:23 back 9:15 11:25 18:12 23:23 28:4,7 28:13,16,19,21,23 29:8 36:18 37:10 53:9 54:20 57:7 63:17 71:3 71:4 75:2 89:22 104:11 bad 23:25 94:6 95:4 ball 56:7,12,23 57:1 bargaining 30:2 based 62:25 63:2 96:25 Basically 98:25 basis 16:1,9,25 20:4,11 30:18 61:2 97:14 98:14 99:24 100:2 battered 118:3 battery 117:19 118:3 bed 41:11 beginning 18:13 42:15 begun 31:13 behalf 30:12 91:12,20 92:24 belief 107:24 108:7 believe 13:11,14 15:14 29:6 30:13 31:13,20 43:24 46:23 48:17,20 49:10 54:23 61:2 64:10 80:10 85:7,15,18,21 89:21 90:8,24 93:11 95:3 102:22 103:5,10 105:8,11,14 107:22 112:2 116:5 believing 6:24 Ben-Sorek 2:12 55:1 88:6,8 109:17 109:25 115:8 119:18,25 123:5 124:5 bending 24:1 Beno 39:25 66:6,7,19,23 121:19,20 121:25 Bernard 10:17,19 11:2 best 5:11 85:4 better 99:3,17 105:1 big 63:21 68:14 bilingual 10:7,9 66:13 bin 114:18 bit 37:1 66:7 Black 10:23 66:16 blank 54:24 90:23,24 blood 125:14 blown 23:1,3,4,8,13,14,20 24:7 board 64:1 68:14 92:25 book 90:23,25 91:3,4 bother 18:11 bottle 38:18 bottom 39:11 45:13 77:10 86:2 bound 91:2,4 box 83:5,6 boyfriend 94:14,24 brand 13:23 Braswell 1:7 2:15 7:16,17 8:11,24</p>



11:19 12:13 26:24 27:6 30:14  
39:12 40:3 64:4,6,16 67:3,18,19  
68:2 69:2 70:12 72:3 76:6 78:4  
79:24 80:1 83:10,18 84:5 85:7  
91:9,16 92:21 98:25 114:17  
**Braswell's** 81:6 85:22  
**break** 5:17,20 14:8 37:19  
**breakdown** 42:24 45:2  
**breakthrough** 13:24 16:8,13,24  
17:7,14 18:1,14 19:8 38:5 39:5,9  
41:24  
**breath** 23:10  
**breathing** 57:18  
**briefly** 88:14  
**bring** 68:21 95:25  
**broadcast** 123:2  
**broke** 28:24  
**brought** 43:15 88:18 121:9,15  
**building** 7:15,21 8:10 57:15 64:2  
68:11  
**bull** 102:17  
**bullied** 28:20 85:7,16  
**bullies** 63:23 64:5 67:2,11,13 68:8  
**bully** 64:9 67:4 84:18  
**bullying** 39:13 40:3 84:15,15 85:13  
85:19,21

**C**

**C** 2:1 4:1,1 125:1,1  
**call** 26:25 27:25 29:2,15,16 57:20  
57:24 58:11 59:5 61:20 69:7,19  
69:25 70:9,10,11 71:21,23,23,24  
72:1,20 73:2,10,17,20,22 77:20  
79:10 86:4,12 91:17 94:1,2 95:25  
104:19 105:13,22 106:1,6 109:4  
114:18 120:6,13 121:12  
**called** 25:15,16 26:23 27:3,4,8  
57:11 63:24 77:19 86:3,6,8 91:22  
91:22 101:17 103:1 105:12  
**calling** 28:2 69:8  
**calls** 26:1 60:9  
**calm** 18:14 35:16 46:25 47:14  
48:11 95:7  
**calmer** 48:17  
**calming** 47:15  
**capacity** 1:7,7,8,11,12,13  
**capsule** 38:10,14  
**capsules** 38:11  
**car** 94:14,18,24  
**care** 47:24 52:5 55:17 80:4  
**cared** 45:15  
**career** 110:23 111:3,6,7 115:11  
116:7  
**cares** 83:4  
**CARNELL** 2:7  
**carried** 108:22  
**cars** 117:9  
**case** 5:9 12:22,25 81:24 122:4,15

**cases** 122:14  
**casually** 50:4  
**cat** 102:7,8,12  
**catch** 23:10  
**Caucasian** 66:7  
**cause** 27:7 78:11,16 80:2 107:25  
**caused** 26:24 27:6 110:20  
**causing** 39:13 64:17  
**center** 116:16 118:10  
**certain** 48:24 49:4 89:3  
**certainty** 49:16  
**certification** 3:6  
**certify** 125:4,13  
**change** 33:14 86:21 97:23 107:16  
**changed** 7:11 14:18 15:20 16:5  
**charge** 58:10,12 59:21 93:8  
**checked** 110:7  
**chemically** 18:19  
**chest** 23:21,22 56:9 57:8,10,17,18  
58:2 99:14 115:1  
**Chester** 46:14 74:16,21  
**child** 9:17 51:21  
**children** 9:14,14,15 10:7 11:15  
17:12 40:24 70:22 80:5 99:1  
**chronological** 90:12  
**civil** 1:5 91:12,25  
**claim** 37:25 92:8,10,14 93:20  
113:19  
**class** 9:7,21 10:7,8,9 11:15 47:19  
51:20 66:13  
**classes** 10:5 65:13 111:21  
**classroom** 8:13 21:13 64:23 71:1,9  
71:17 72:5 74:14 75:21 121:10  
121:16  
**classrooms** 64:20  
**clean** 53:20  
**cleanse** 44:21  
**clear** 67:22 69:19  
**clearheaded** 24:11  
**clearing** 69:25  
**clearly** 59:4 106:18,22  
**clergyman** 113:11  
**client** 54:9  
**clipboard** 105:2  
**closed** 37:11  
**closest** 36:20  
**CLYDE** 1:7 2:15  
**collapse** 23:21 24:3  
**collective** 30:2  
**college** 111:16,21  
**colloquy** 101:7 103:15 119:8,12  
**come** 9:15 19:13 20:18 43:21 52:16  
71:10,14 98:16 99:2,18 101:17  
103:23 105:24 106:9,17 107:4  
115:18 117:1  
**comes** 18:12  
**coming** 39:16 41:1 49:11,17,24  
68:15 70:12 72:2 104:4

**commencement** 125:8  
**comment** 9:3 34:16 48:22 81:6  
**commented** 33:22  
**comments** 8:25 50:4 114:19  
**Commission** 93:10  
**common** 12:20 13:3 71:20 72:24  
**communication** 107:11 120:8,17  
121:7,24  
**communications** 104:11 120:20  
122:1  
**complained** 11:13  
**complaint** 92:2,24 93:8 110:16  
111:5  
**complete** 89:11 124:14  
**completed** 5:12 12:12  
**computer** 37:12  
**computing** 110:18  
**conception** 107:4  
**concerned** 27:11 57:10 88:3  
**concerns** 84:23  
**concluded** 123:7  
**conclusion** 107:5  
**condition** 26:25 29:3,7 61:22,24  
63:1  
**conditions** 15:19,23 96:14  
**conducted** 12:12  
**confused** 108:12  
**confusing** 5:14  
**connect** 36:20,22,23  
**connection** 15:23 91:13,20  
**connects** 37:3  
**consider** 8:8 64:8 67:4  
**considered** 8:19  
**considering** 60:18,25 64:3  
**constant** 40:23  
**consulted** 24:15 42:2  
**consume** 19:24  
**consumed** 21:7  
**consuming** 20:11 41:9  
**consumption** 20:17  
**contact** 30:4 122:18 123:2  
**contacted** 122:20,22  
**contemplating** 62:3  
**contention** 13:3  
**context** 81:23 91:5,24,25  
**continue** 112:14  
**continuing** 74:7  
**controversy** 125:16  
**conversation** 30:10 58:24 67:8,21  
68:5,24 70:25 74:13,18 77:14  
78:1 79:23 81:16 82:16,18,19  
83:18,21,24 89:7 94:17,21 95:2  
98:17,20 103:12,20 105:17  
108:22 114:8,9 116:3  
**conversational** 5:7  
**conversations** 33:17 67:20 72:25  
74:23 77:18 108:18  
**cope** 23:5

cops 101:13,14  
 core 12:20 13:4  
 correct 7:18 12:1 15:16,23 16:9  
 17:3 21:18 34:8,9 35:13,14 36:8  
 38:24 39:2 40:11 49:12 50:8 51:4  
 52:2,21 58:7,13,14 59:22 60:23  
 72:6 73:6 76:18 80:12,14 81:8,13  
 83:10 87:2,12 92:18 93:20 94:10  
 96:23 109:25 120:14 121:13  
 123:14  
 corrected 80:16 81:19  
 counsel 33:16,17,19,24 77:7 93:6  
 125:17  
 counselor 113:10  
 count 22:16  
 County 1:10,10,13 2:7,8,8 32:6  
 88:8,19,19 92:11,15,18 123:9  
 County's 109:18  
 couple 89:16  
 course 31:16 47:23 52:4 55:11,16  
 courses 111:13  
 court 1:1 3:15 4:23 5:3,14 53:4  
 89:4,12  
 Courts 82:4 122:14  
 coverage 122:4  
 covered 76:12  
 crazy 86:25 107:3  
 credits 111:17  
 crossed 76:14  
 crowded 108:20 109:6  
 cry 95:7  
 crying 24:13 45:10,12 46:8 95:3  
 current 7:5,15,24 9:7 11:14  
 currently 7:2 15:4  
 curriculum 12:18,19 13:4  
 curtained 36:17  
 curtains 36:18

**D**

daily 16:1 97:25  
 damage 110:24 113:20 116:11  
 damaged 113:20  
 damages 110:18  
 danger 56:8  
 date 25:2,8 60:5,10 62:15 77:17  
 90:17 120:4  
 dated 90:15  
 dates 90:1,6,9  
 daughter 33:12,13 86:23 113:3,4,6  
 113:7  
 day 6:15 17:15,17 21:11,14 23:9  
 34:8 39:9 49:7 50:3,8,13,16 53:3  
 53:18,25 54:13 57:15 59:22  
 62:13 63:9,14 71:10 72:11 74:2,4  
 96:3 97:18 99:5 108:10,12,20  
 114:4 123:19 125:19  
 days 31:17 62:3  
 DEBORAH 1:6 2:15

decided 112:7  
 decision 69:18  
 Defendant's 25:1,4 89:20 117:17  
 120:3 124:8  
 Defendants 1:15 2:8,14 68:16 91:7  
 93:11 109:18 110:19  
 DeGennaro 1:23 4:3 125:3,22  
 degree 12:20 99:9  
 delay 69:3,8  
 demoralized 40:25  
 Department 1:10 2:9 88:19  
 deposition 3:6,13 32:2 88:14  
 depositions 32:5  
 depressed 41:6 42:18,19  
 depression 15:15 21:17 45:17 46:1  
 96:17  
 Deputy 88:8  
 describe 10:20 12:15 16:15 18:6  
 20:16 23:2 24:9,11 36:14 58:17  
 59:8  
 described 21:15 24:9 35:6 49:18  
 description 101:22 124:8,13  
 desk 108:20,23  
 details 44:23  
 development 64:21,24 65:9  
 diagnosed 15:15,18  
 die 94:7  
 difference 23:12 61:6  
 different 47:5 50:7 55:15 80:7  
 difficulty 19:14  
 dinner 19:25  
 directly 125:15  
 discharge 60:22 76:8  
 discipline 29:22  
 disciplined 30:21,22  
 discovery 33:7  
 discriminated 13:11  
 discrimination 85:12 93:9,20  
 discuss 26:22 71:11  
 discussed 112:16  
 discussing 27:20,21  
 discussion 22:1 56:22 93:4 119:19  
 distress 110:24  
 district 1:1,1,6,8 2:15 4:18 7:3 9:2  
 9:16,16 11:14 13:1,12 32:6 68:12  
 69:16 74:24 92:11,15,18 93:11  
 104:10 120:9,21  
 district's 87:1,5  
 doctor 18:17 29:3 42:2 50:12 57:20  
 57:24 59:3,6,8,16,21 61:13 63:11  
 63:12 95:8,11 109:8  
 doctors 61:21 108:16  
 document 25:5,8,10,12 26:11  
 32:23 55:21 61:19 90:3,10 91:1  
 109:22 110:4  
 documents 24:24,25 32:1,4 124:9  
 Doe 1:9,9,13,13  
 dog 102:21

doing 42:24 112:1  
 door 36:21 37:1,11 101:5,11,12,23  
 101:24 102:3,9,10  
 doorway 36:22,25 74:14  
 doorways 36:22,23,24  
 dosage 14:20 38:13,21 39:4 97:5  
 97:23  
 dosages 14:17  
 dose 18:5 19:2 39:8  
 dot 89:9,9,9  
 doubt 21:9,10  
 downs 40:23  
 Dr 45:15 47:18 50:14,15 51:20,22  
 62:10 64:1,4,6,8 67:3,18 68:2  
 69:11 86:25 87:5,12 88:2 119:14  
 draw 83:6  
 drawn 83:5  
 drink 20:19,20 41:9,13  
 drinks 20:22  
 Drinkwater 95:2,6 113:17  
 drop 57:1  
 dropped 56:6,12,23  
 drove 94:24,25  
 due 11:20 96:13,16  
 duly 4:2 125:7  
 dung 26:24 27:13,17  
 dunk 27:22  
 Duresco 86:6  
 dying 94:7

**E**

E 2:1,1,5 125:1  
 e-mailed 76:7  
 ear 43:4,7,19,24 44:2,10  
 earlier 47:10 49:10,18 60:15 61:12  
 62:20 80:10 88:16  
 early 17:23 41:11 96:12,20  
 easier 4:22,25  
 EASTERN 1:1  
 edit 33:25  
 Edith 1:7 2:16 105:15  
 education 68:14 111:23,25  
 EEO 93:13,23  
 effect 3:14 19:15 94:6  
 effecting 99:10  
 effects 18:3,10 19:5  
 either 11:9,18 12:13 49:6 59:20,24  
 78:23 118:24,24  
 elaborated 56:22  
 eleven 34:17  
 Emanuel 70:14  
 embarrassment 109:12 111:1  
 emergency 24:21 76:8  
 emotional 110:24  
 emotionally 45:9 46:6  
 employ 125:17  
 employed 7:2  
 employees 1:8,13 74:24

Employment 93:10  
 encounter 103:14  
 encouraged 41:21  
 engage 114:8,9  
 entered 36:3  
 entire 39:18 45:11 49:16,19,20  
 103:14 114:1  
 entirety 26:12 48:25  
 entries 26:8 32:22,24 90:13,15  
 entry 26:22 27:2,25 29:1,15 32:19  
 34:7,12 60:7 63:10,13,21 76:7,11  
 76:15 77:10,16,22,25 86:3 90:7  
 episode 78:14  
 Equal 93:9  
 ESQ 2:5,7,12,18 4:6 88:6  
 evaluated 12:4 63:16 119:10  
 evaluation 11:23 109:15  
 evaluations 8:12 12:16  
 evenings 41:8  
 event 16:16  
 events 53:14,15 59:21 74:1 92:3  
 98:17 105:25 120:10  
 everybody 45:6 51:23 70:8 71:21  
 78:11,13 114:2  
 everybody's 51:18  
 evil 78:25  
 exact 109:9  
 exactly 34:7 49:25 51:11 71:13,14  
 examination 1:20 4:6 6:17 88:2,6,9  
 123:6 124:3  
 examined 4:4 109:9,13  
 example 38:17 65:5  
 excess 20:21  
 excited 19:12  
 Exhibit 25:1,4 89:20,21 91:6,8  
 96:25 120:3  
 EXHIBITS 124:7  
 existing 29:3,7 61:21,24 63:1  
 experienced 35:7,9  
 experiencing 64:25 99:15  
 explain 27:1 51:7 71:13 113:20  
 114:25 119:11,14  
 express 65:8,11  
 expressed 99:18  
 extent 90:14  
 eyes 18:10,11  
 eyesight 18:11

**F**

F 125:1  
 facility 118:7  
 fact 14:22 17:6 91:21  
 facts 110:15  
 fair 27:10 60:17 63:4 87:14 88:1  
 95:23  
 false 75:14,18 76:3  
 falsely 117:18,20  
 family 45:16 47:23 51:19 52:5,11

55:12,17 112:17 113:1,2  
 far 23:17 53:6,7 69:25 79:12 81:14  
 82:13 84:1,2 121:21  
 fashion 26:25 27:12  
 fatigued 41:5,8  
 fee 110:25  
 feel 11:20 18:2,8,20 28:15,18 41:2  
 42:12,19 65:8 84:15 99:3 104:25  
 111:6  
 feeling 19:5 42:5 63:2,5  
 feelings 22:19  
 feels 23:18  
 felt 23:20,24 24:2,2 28:9,13,20,24  
 40:25 83:8 84:14 94:6  
 female 56:19 100:22 101:4 107:12  
 122:16  
 fetish 118:21  
 fictitious 1:9,14  
 field 1:12 2:10 88:22 111:23,25  
 115:20 116:13  
 fifteen 80:6,8,14,18,19,23 81:7,15  
 81:18,20 82:9,11,21,22,24  
 fifties 11:12  
 figure 89:10 108:3  
 figured 108:4  
 file 30:11 59:5 78:9  
 filed 30:13,16 69:1,5 91:7,9,11,15  
 91:19 92:2,8,17,20,24,24 93:9  
 filing 3:5 81:23 92:12 93:13,17,19  
 93:22  
 fill 14:2 98:6  
 finally 5:22 59:2  
 find 87:8 121:16  
 finds 9:16  
 fine 98:8  
 finish 5:10 89:5  
 finished 89:21  
 Fiorinal 13:23 96:22 98:13  
 first 4:2,23 7:6,13 10:1,14 11:16  
 12:19,23 16:23 18:6 26:21,22  
 31:5 35:18 51:23 56:11 61:19  
 62:23 65:5,7,14,15,20,22 66:20  
 68:21 72:17 74:20 75:1 84:24  
 85:1,5 86:19 103:17 108:3 109:1  
 five 12:7 59:2,18 109:22  
 floor 47:21 51:23 55:9  
 fluctuated 9:10,13 10:11  
 follow 107:16  
 following 66:21,23 72:6 75:24  
 follows 4:5  
 fooling 21:12  
 foot 118:21  
 force 3:14  
 forced 75:6  
 foregoing 123:11  
 forgot 55:7 75:3  
 form 3:9 38:8 107:21 108:7  
 formal 91:24 92:23

formals 12:7,9  
 formed 117:11  
 forth 104:11 110:17  
 forty 11:4 66:9  
 Forty-five 32:16  
 forty-ish 11:11  
 FOSKEY 2:7  
 four 10:3 59:2,18 93:7 109:22  
 110:12,20 117:16  
 fourth 66:24,25  
 frame 109:3  
 Free 1:6,8 2:15 7:3  
 Freeport 117:5  
 frequency 16:4,15  
 frequent 20:11  
 frequently 17:8 70:23  
 friend 36:3,6 37:24 63:12,18 73:3  
 112:17 120:25 121:18  
 friend's 121:15  
 friends 73:15 78:13  
 front 30:21,23 79:5 101:23,24  
 107:16  
 full 23:1,2,4,7,13,14,20 24:7 54:13  
 79:25  
 function 23:15  
 funny 51:24  
 further 3:8,12 37:10 88:5 104:22  
 105:17 111:7,11,12 123:5 125:13

**G**

general 15:3,5,21 44:6 85:13 88:10  
 generally 84:8 114:13,20  
 Generic 13:23  
 gentleman 118:16,17,19  
 GERALD 2:18 4:6  
 gesture 89:13  
 getting 63:22 64:3,5 67:2,11,14  
 107:3 111:16  
 girl 73:15  
 give 5:1 9:12 70:13 71:25 72:4  
 74:11 77:6 79:18 101:22  
 given 12:3 88:16  
 glass 19:25  
 go 4:22 11:25 14:7 18:25 23:5  
 26:19 28:4,7,13,16,18,21,23 29:8  
 37:1 46:20,21 47:17 53:9 54:20  
 55:6,20 58:1,4 59:3 61:8 63:5,15  
 63:22 78:5,7,12 79:2 86:10,24  
 88:14 89:22 104:6 105:19,21  
 106:20 111:7,11,12 118:22  
 goes 18:18,23 81:14 122:14  
 going 4:23 5:8,25 21:12 23:7 24:3  
 24:10 29:8 34:10 39:11 42:6,23  
 45:1,9 47:20 50:22 53:3 54:11  
 56:25 57:7 60:13 63:25 64:2,13  
 64:14 68:8 70:7 79:21 86:16  
 87:20 90:2 101:24 104:20 106:21  
 112:1,18

Gonzales 65:24 66:12,17  
good 4:16 11:5 78:6 88:7  
gossip 68:20 114:3  
gotten 86:9,11,13  
grade 7:6,13 10:1,14 11:16 12:19  
12:23 31:5 65:5,7,14,15,20,22  
66:20,24,25 72:17 84:24 85:1  
granddaughter's 77:1  
grandparents 9:15  
Great 18:22  
grievance 30:11,13,16,19 69:5 78:5  
78:7,9 79:9,14,19 81:24 91:9,19  
91:25 92:20  
grievances 91:6,11,15  
ground 47:21 55:9  
guess 11:6 71:5 102:15  
guessing 29:14  
guided 12:19

**H**

H 4:1  
ha 69:3,3,9,9  
half 59:19  
hallway 35:23,24 37:1,2,3  
hallways 36:20  
Hamilton 2:16  
hand 25:3 125:19  
hands-on 69:17  
happen 78:17,22 106:23  
happened 44:20 66:19 71:2 78:18  
81:13 98:22 108:24  
happening 26:9 53:25 54:16  
happy 21:11,14 64:1,2 75:7,11  
107:17  
harass 57:5  
harassment 109:12  
hard 47:19 112:22  
head 5:4 18:10 24:2 57:19 89:13  
95:4  
headache 94:6 96:9 99:10  
heading 123:13  
heads 70:13 71:25 72:4  
health 45:16  
hear 88:24 101:7  
heard 45:25 48:25 49:7 71:25 72:3  
114:11  
heart 23:10  
held 1:22 7:7 93:4 119:19 125:6  
help 26:3 42:10 47:20 51:21 109:7  
helps 18:19  
henchman 87:1,5  
hereof 123:13  
hereto 3:5  
hereunto 125:18  
Hicksville 4:10  
Higgins 1:7 2:16 8:1,12,24 11:19  
12:13 30:16 31:6 39:25 44:3  
45:21 46:13 47:22 48:20,22 50:1

52:1,9,15 55:4,5,7,10 67:4 68:9  
73:16 85:15,19 99:19,22 105:16  
105:18 106:11 119:15 120:6,14  
121:9,13,15,25  
Higgins' 100:13  
Hispanic 10:25  
home 20:18 23:5 41:1 46:21,21  
94:24 95:25 99:2,5,9,16 100:18  
103:22 115:15 118:22 120:15  
121:5,22  
hospital 29:2 58:2,4,13,23 59:11  
59:17 60:23 61:21 95:9,12 107:7  
107:22 108:14 109:13 117:22  
118:9 119:7,11  
hospitalized 24:18  
hour 59:14,15 69:3,8  
hours 6:4 19:3,4 27:9 56:7 59:18  
59:19 89:16 105:1,4,22  
house 56:5,15 98:19 103:18 105:20  
105:21 117:1  
hug 75:8  
humiliated 79:5  
hurt 41:5,7 47:22,24 50:22 52:6,9  
52:10,13,14,16 55:10,13,18,24  
95:4 99:20 104:20 106:15 119:16  
hurting 50:4 55:14 57:18  
hysterically 24:13

**I**

idea 27:19 38:13 78:6 108:5 111:20  
identification 25:2 120:3  
identified 13:15 15:25 54:7 65:17  
identifies 68:2  
identify 13:10 25:7 67:13  
ill 95:19  
imagine 10:12  
immediately 18:4,18  
impact 19:17,22  
impair 6:4  
important 76:17 81:25  
imprint 76:20  
imprisoned 117:18,20  
incident 17:1,2 21:8 22:12 27:9  
30:24 42:7 91:13 111:4 114:5  
115:2  
include 116:6  
including 19:8  
increased 16:14,24  
INDEX 124:1  
indicate 38:21 40:7 60:5 77:13  
105:12 119:7  
indicated 93:7  
Indicating 101:25  
indignant 99:25  
indirectly 125:16  
individual 122:18  
Individually 1:6,7,8,11,12,12  
individuals 8:7,10,18 44:1 48:19

73:25  
informal 92:23  
information 30:4 38:17 90:16  
124:12  
initiated 98:20  
injury 110:14,17  
inquire 99:23 100:2  
inquiry 104:22 108:16  
INSERT 14:3 98:7  
instance 89:23 90:13  
instructions 88:13  
intend 112:11,13  
intended 106:15  
intentions 92:12  
interaction 115:9 116:8  
interested 125:15  
interpret 89:13  
interrogatories 109:19 119:23  
124:10  
interviewed 119:6,10  
intimately 51:18  
intimidate 107:25  
invited 102:15  
involved 64:11,12 66:13 68:19  
75:3  
issue 17:11 42:5 71:11  
issues 21:15 64:24 65:6 66:14 85:2  
item 54:5

**J**

Jamaican 10:21  
January 1:18 125:19  
Jeff 26:23 27:3 29:19,24 30:7,9  
60:7,14 62:4,4,18 63:12,19,20,24  
69:6 78:2 80:5,8,16 81:5,16 82:8  
83:12,14 86:10 91:8  
jeopardy 87:17  
Jericho 2:4,4  
Jerry 4:17  
Jewish 66:1  
job 4:25 63:17 78:12 85:4 86:17  
87:16,19 88:3  
John 1:9,9,13,13  
joke 47:21 51:3,8,12,14,25 55:8,10  
60:1 119:15  
joking 52:17  
Joseph 1:10 2:9 88:20  
journal 90:20  
Joy 70:7,13,14,24  
Julie 36:3,6 37:24 40:1  
Julie's 36:4  
jump 47:20 51:15,22 100:8  
jumping 60:1 106:10  
June 60:4,10 61:14,17 62:14,20  
71:7 77:17,20,21 90:16

**K**

keep 24:1 61:3



keeping 88:3  
keeps 61:4  
kept 39:12 55:5 57:17  
kids 85:4  
kinds 114:19  
kitchen 101:21,25 102:5,10  
knew 6:1 45:15,16 70:9 71:21  
72:23 75:16 81:19  
know 5:8,18,24 10:4,10,13 11:1,4,7  
11:7,8 14:8 16:12 20:18 22:12,16  
27:9,23 29:23 30:1,3,11,15,17  
34:23 35:2 38:19,20 39:17 43:10  
43:13 44:4 46:21 51:18,19,23  
53:3 54:13 55:14,25 58:25 60:6  
60:12 61:5 62:15,16 63:12 65:2  
67:17,19 69:13 70:1,6 71:23 75:2  
75:3,9,15 76:8,12,14,21,22,23  
77:3,24 79:12,13,16 80:7 81:10  
82:6 84:2,13,21 85:24 86:13 87:8  
91:14,18,23 92:6 93:16 97:8  
100:12,12 101:14 103:19,19,23  
103:24 108:4,13 112:1,15,18  
113:25 114:1,16,17 116:18  
120:24 121:7,21 122:8,9,20  
knowing 51:18  
knowledge 19:23 69:3,7,13,16 70:3  
70:5 71:20  
known 69:10 72:24  
knows 84:1 114:1,2

**L**

L 1:6,7 2:15,16 3:1  
label 38:18  
lack 64:23  
landing 101:25  
large 37:9  
larger 36:17  
late 35:16 86:5,13  
laughed 51:23  
law 88:10  
lawsuit 4:19 27:7,21,22 29:15 59:6  
68:16 74:10,21,25 79:1 88:18  
92:12,17  
lawyer 29:15,16 33:6 86:3  
layout 101:23  
lead 103:6 106:1  
leader 58:12  
learn 43:21 105:25 107:18  
learned 120:18,23  
leave 14:1 17:23 28:1,3,13 56:9  
60:7,13,14,19 61:1,2,4,5,6,7,9  
62:11,18,25 95:16 96:2 98:5  
102:12  
left 35:24 36:2 40:20 44:23 46:14  
53:8,8 54:24 56:7 57:14 86:6  
94:10 95:18 96:6,8,12,16 103:22  
119:2,4  
left-hand 90:1,6

legible 76:21,25  
legs 24:2  
Let's 103:15  
letter 92:2  
letting 79:1 103:17  
level 97:5 102:1  
liberty 117:19,25  
lie 46:21  
Lights 18:11  
likes 78:10  
limiting 115:6  
line 34:13 86:25 98:5 105:25  
112:11,22  
lines 34:11,17 42:22 59:2 117:16  
Liora 2:12 88:6,8  
Lipitor 13:23 96:22  
list 124:14  
listening 58:11  
litigation 92:1  
little 37:1,10 53:20 62:23 66:7  
71:13 99:25 114:19  
live 9:14 55:12  
lived 120:24 121:1  
locked 118:6  
long 14:4 18:2 19:1 32:15 42:6  
47:19 58:23 59:10,16 73:5 97:16  
longer 111:9  
look 25:5 29:25 54:21 63:11  
looked 36:15 53:6,14 105:2  
looking 34:23 48:18  
looks 29:20 76:11,19 77:19 79:22  
122:14  
loony 114:18  
losing 86:17  
loss 111:2 115:11 116:7 117:19,24  
lost 110:23  
lot 63:25 70:22 111:8 112:23,23,24  
118:5  
louder 88:25  
loudly 72:23  
Louis 43:13  
love 47:24 52:5 55:17  
loving 99:1  
Lynn 70:11 104:7

**M**

M 2:12 4:1 88:6  
main 37:3  
making 19:20 45:24 46:5 48:2  
49:21,22  
male 56:18,19 100:22 101:3 103:7  
man 58:19  
manner 91:16 92:1  
March 122:4  
margin 71:6 77:16 90:1,6  
mark 24:24 119:24 120:1  
marked 25:1,3 120:2  
marriage 125:15

Martinelli 10:18,24 11:10,11  
matter 125:16  
Matthew 1:12 2:10 88:21  
McCARThY 1:2,20 4:8,16 25:9,9  
26:21 32:18 34:10 88:7 109:21  
110:1 123:16 124:4  
mean 20:1 23:2 27:16 28:22 29:4  
40:21 47:5 57:9 63:23 64:15,18  
70:4 71:14 74:9 78:25 79:6 84:7  
84:8 87:5 95:4 109:23  
means 29:23 63:15 80:25  
meant 6:1 27:1 56:1 63:12 81:10  
82:25  
media 122:3,6  
MEDIC 1:12 2:10  
medical 15:1 17:5 24:15 26:24 28:1  
28:3,7,12 29:3,7 42:9 57:16  
60:14,19 61:1,1,4,6,22,24 63:1  
88:21 107:6 108:15 118:10 119:6  
medically 23:18  
medication 13:24 16:13,24 17:7,14  
18:2,3,14,20,21 38:21 39:1 41:24  
45:18 46:2 89:17 97:13,19,21  
98:11 124:15  
medications 6:3 13:16,18 14:2,5,11  
14:15,17,21 15:2,25 19:7,9,18,21  
38:22 42:3 96:21 124:14  
medicine 16:8 38:1,4,5 39:5,9  
46:18,19 97:15  
meet 32:12 86:24  
meeting 30:25 31:4 43:15,15 79:7  
80:3,11,24 81:3,13,14,15 82:9,11  
82:22 87:21,22  
Melissa 113:9  
member 112:17  
memory 4:21 19:10,17 26:3  
mentally 118:6  
mention 44:8 68:7,16 91:8,16 94:1  
114:10  
mentioned 46:10 55:9 67:3 68:9,10  
96:22 100:23 103:3 120:5,13  
message 86:6  
messy 89:10  
met 4:16 50:6,12 88:9  
method 110:18  
mid-way 56:3  
middle 34:12 37:23 83:2 96:3  
113:7  
midst 81:23  
migraine 16:20 18:7 19:5 23:22  
35:7,9,12,22 56:10 57:8 95:15  
99:2,9 104:24 106:22 115:1  
migraines 13:24 16:8 17:13,14,24  
23:25  
Miles 10:17,22,23 11:9,12  
milligrams 38:14 97:7  
mind 56:9 57:8  
Mineola 1:17 2:11

minis 12:7,9  
minute 67:23 119:18  
minutes 32:16  
mixed 19:17  
moment 9:8,9 25:5 37:23  
Monday 76:17 77:17,19,21  
Monique 1:11 2:10 88:20  
month 16:18 28:25  
monthly 16:16,18  
months 39:12  
morning 4:16 31:1 39:2 72:14  
80:11  
move 9:14 40:16  
moved 66:24,25  
Moving 46:22 52:1 60:3  
municipal 88:10

**N**

N 2:1 3:1 4:1 125:1  
name 1:9,13 4:7,17 35:18 36:4 43:9  
43:11,13 58:15 59:6 63:20 74:15  
88:7 97:16 105:15 110:1 122:8  
named 92:17  
names 1:9,14 10:13 100:23 113:8  
Nanette 73:3,4  
Nassau 1:10,10,13 2:7,8,8 88:19,19  
118:10  
nature 110:13 111:14  
necessary 78:20,21  
neck 18:12 23:23  
need 5:17 17:7 18:5 46:19,21 89:17  
104:24 109:7  
needed 16:9 57:16 58:1 61:8 65:9  
86:23 98:9,14  
needs 109:2  
negative 12:16  
neighborhood 116:22  
neighbors 116:21,23  
nervous 42:24 45:2  
neurologist 15:6,7,22  
never 47:24 52:6,13,14 55:13,16  
55:18 56:9 57:8 78:18 80:1,4  
97:16  
New 1:1,17,25 2:4,11,17 4:4,10  
122:7 123:3,8 125:4  
night 21:8 32:11 39:14 40:4,22  
41:1,15 42:6,12,17,19 86:5  
nightgown 107:15  
nightly 20:4  
nights 41:7,10,12  
nine 42:21 46:22  
nod 89:13  
nonsense 74:8,9  
nonspecifically 104:4  
normal 49:5  
normally 20:25 84:25  
notarized 109:19  
Notary 1:24 3:14 4:3 123:21 125:3

notation 71:6 77:25  
notebook 25:13 77:1  
noted 123:12  
notes 25:14,20,23 26:8,12,15 31:10  
31:20,24 33:1,4,14 44:9,16,17  
51:2 52:20,24 53:12,13,17,24  
54:17 56:4 60:5,15 61:12,16  
76:15,23 77:4,6,23 81:5 82:15,18  
notice 1:22 23:7 92:8,10,11  
Notices 92:14  
number 9:10 82:1 111:12  
numbers 10:10  
nurse 37:14 39:24 45:22 50:1  
58:10,12,15,17 59:10,12,20  
73:22 74:2,3 108:23  
nurse's 36:12,13,14,21 37:2,3,5,10  
70:16 73:1 74:15 94:4 119:8,12  
nurses 108:15  
NYSET 26:23 27:4,14 30:10

**O**

O 3:1 125:1  
object 80:21  
objecting 107:20  
objection 8:14,20 12:5 13:7 14:6  
18:16 24:12 26:4 27:18 33:3 38:9  
39:7 44:11,18 45:4 46:3 48:16  
49:2 50:25 51:9 52:12,18,22,23  
53:19 61:3 62:1 63:7 65:1 66:22  
68:17,23 69:21 70:2 81:1,21 82:2  
84:10,20 85:9,25 87:18 92:4 96:4  
99:11 100:9,15 106:2,12 107:8  
108:2,11 112:20 113:22 114:14  
115:3,12 116:9,14,20 122:21  
objections 3:9  
observation 11:22  
observe 8:12 103:20  
occasion 96:6  
occasionally 19:25 20:1  
occasions 16:12 17:22 30:22 41:23  
85:6,14 96:8  
occur 17:13,15,16 23:6 121:2  
occurred 17:17,19 24:5 30:25  
35:13 53:16 54:16 72:5 73:9  
104:12 111:3 116:12 119:8,12  
occurrence 95:24  
occurring 90:16  
October 109:20  
offer 95:11  
office 36:11,12,14,14,21 37:2,3,4,5  
37:6,11,14 50:17 70:16 73:1 94:5  
119:8,13  
officer 1:10,11 2:9,9 56:13,17 57:4  
88:20,20 103:6 106:14 107:12  
115:10,10 116:12,13  
officers 56:14 100:17,20 101:8  
102:20 103:3,21 104:2,12 105:5  
105:9,12 106:4 107:5 115:14

118:25 120:8,12,19 121:4,8,10  
121:12,21  
official 1:7,7,8,11,12,13  
officials 91:12,20  
oh 52:17  
okay 5:5,6,15,16,20,21 6:1,2 14:10  
41:16 50:11 54:22 89:2,14,15,24  
120:16  
old 11:1 21:4 62:13,17  
once 16:19 20:2,3,12 31:11 88:9  
97:18  
ones 22:23,25 37:9  
online 60:8 62:11,18  
onset 18:7  
open 36:19 102:3  
openly 71:18  
opinion 107:21 108:7 117:11  
opportunities 110:23 111:3,6  
115:11 116:7  
Opportunity 93:10  
opposed 107:6  
order 63:17 90:12,22  
organize 26:5  
original 76:23 77:4,6 119:25  
ostracizing 54:24,25  
outcome 79:13,16 93:17  
outlet 122:6  
outside 36:25 85:1  
overcrowded 64:20,23 65:13  
overheard 102:24  
overnight 24:18

**P**

P 2:1,1 3:1  
p.m 77:11 123:7  
pack 112:3,3  
packet 24:25 124:9  
page 26:21 32:18 34:6,10 35:5,5  
37:22,23 39:11 42:21,21 45:13  
46:15,22 54:20 55:2,5 56:3 58:9  
59:1,1 60:3,4 61:19,20 62:5,23  
76:7,18,20,24 77:9,9,10,21 79:21  
83:2 86:2,3 89:22,23,25 90:3,17  
90:21,22 93:7 109:22,23,24  
110:12 124:3,8,13  
pages 26:11 53:6,14 90:10,13,21  
90:23,24 91:3  
pain 23:24 46:22 57:19 110:25  
114:24,25  
pains 23:21,22 56:10 57:8,11 58:2  
58:3 99:14 115:1,5  
panic 21:17,20,23 22:3,11,14,18,25  
23:1,3,4,8,9,13,14 24:7,16 27:6  
35:17,22 45:17 46:2  
paper 63:14 75:7,10 86:5 87:24,25  
papers 60:8,13,14 62:11,18 76:8  
86:9  
paperwork 28:1,2

paragraph 29:2 110:20,22 111:2  
117:16  
paranoid 83:13,19 84:5  
paraphrasing 112:3  
parenthetically 70:8  
part 36:19 39:21 85:22  
particular 9:17  
particularly 80:23  
parties 1:22 3:5 125:14  
parts 49:12  
patient 118:17,23  
patients 109:6  
Patty 86:6  
pause 37:20  
peers 30:21,23 79:5  
pending 5:19  
people 31:3,7,9 39:16,20 45:1  
46:10 48:7 49:11,17,23 50:7,16  
51:7 59:25 63:25 68:15,18,19  
71:17 72:8 80:6,8,11,23 81:3,7  
81:15,18 82:9,11,21,22,24 87:8  
100:10 106:24 114:4 117:13  
118:5,5  
perform 8:11,12  
person 39:19 40:8 69:17 78:10  
89:9 102:16  
personality 78:15,24  
personnel 108:1 120:9  
perspective 105:6  
pertaining 4:19  
phone 26:1 70:12 71:21 72:4 83:21  
83:23 105:13 106:1  
phonetic 86:6  
phrase 27:13 55:24 57:1,2,7  
physical 22:19 23:6 24:8 57:11  
58:2 109:2 110:25 114:24,25  
physically 41:2,3 47:2 57:16 58:17  
59:8 118:12  
physician's 108:15  
pick 101:18  
picked 57:23 94:12 95:19,21,24  
pills 38:24 47:12  
pit 102:17  
place 1:23 68:22 105:25 118:4,7  
123:12 125:6  
placed 36:7  
places 48:10 106:23  
Plains 2:17  
Plaintiff 1:3,21 2:3 4:13 25:8  
110:15  
Plaintiff's 109:17  
plan 112:4  
plans 111:17  
play 89:8  
playing 102:17,19,20  
please 4:7,9 5:1,17,23 88:24  
pocketbook 38:1 97:3  
point 7:20 14:13 16:3 20:10 30:15

35:6 39:8 40:16 49:6 50:2 55:23  
57:14 60:17,21 75:17 87:11 97:6  
104:23 113:24 115:18  
police 1:10,10,11 2:9,9,9 27:8 56:4  
56:13,14 70:12 72:2 88:19,20  
91:17,21,22 94:1,2 100:17,20  
101:8,10,23 102:13,14,20,23  
103:3,12,16 104:9,17 105:18,22  
117:1,9,12 118:25 120:5,12,19  
121:9,11,21  
Port 86:10  
position 7:5,7,11  
positive 12:15,17  
possible 49:17 77:15  
Post 122:7,11 123:3  
powerful 16:21  
practitioner 15:3,5,21  
precipitated 102:12  
premise 82:12  
prepare 32:1,13  
prescribe 15:2  
prescribed 19:8 96:21 97:13 98:12  
prescription 13:16  
present 31:4 44:1 70:16 73:1 74:17  
75:22  
presently 1:9,14  
pressure 18:9,23  
pressuring 76:4  
presume 89:1  
pretty 12:25 88:15 90:2 112:3  
prevent 29:8  
previous 51:4  
principal 7:15,17 45:15 51:4,18  
92:25  
principals 7:22,25 8:5  
prior 14:4 22:1,2,11,15,23,25 26:7  
41:23 42:6 46:15 48:15 51:3  
90:16 95:20 96:12 109:13 111:17  
112:4 117:3  
probably 29:24 53:20 68:9 72:18  
80:19 87:3,19 90:19 98:21 99:7  
117:7  
problem 19:11 65:12 70:22  
problems 40:24 78:16  
proceeding 37:21 125:5  
process 43:14 87:25  
produced 25:8  
profession 111:8  
professional 24:15 64:21,24 65:9  
professionally 112:17  
prompted 25:23  
proper 9:18  
provide 33:4 106:4 107:25  
provided 6:16 26:16 30:7 33:9  
121:20  
providers 15:1,4,22 17:5  
providing 6:11 33:16  
psych 114:17

psychiatric 57:12 107:2,6 109:14  
116:16,19,24,25  
psychiatrist 15:10 46:16,24 63:16  
86:10 113:13  
psycho 83:15,19 84:5  
psychologist 15:10 35:15,19  
psychologist's 36:10  
Public 1:24 3:14 4:3 123:21 125:3  
published 123:2  
Pullen 27:3,14,21 28:12 29:19 30:7  
30:9 62:4 67:8,10 78:2 79:3,23  
84:4 91:9  
punishment 59:5 109:10  
purpose 44:17,21 109:14  
purse 41:18  
pursuant 1:22 88:10  
pushed 78:5  
pushing 35:1  
put 40:23 53:5 55:8 57:12 70:12  
72:3 114:17  
putting 10:9 81:24 92:10

## Q

question 3:10 5:8,10,19,19,23,25  
23:17 28:10 34:5,16 44:14 50:5  
53:10,11 62:7 70:7 77:2 88:24  
89:1 93:12 99:23 100:5,6 110:12  
questioned 120:25  
questions 4:13,19 6:12,16 46:16,17  
50:7,13,15 74:3,6 82:5,12 85:6  
88:17 89:6 105:6 107:14 115:23  
quick 109:2  
quiet 107:13  
quite 108:19  
quotes 81:12  
quoting 27:14 46:23 78:1 79:22,23

## R

R 2:1 4:1 125:1  
race 8:25 9:3 10:20,20 11:20 13:5  
65:25 66:15  
racing 23:10  
rambling 77:23  
reaction 26:24  
read 26:22 33:11 80:1 123:11  
reading 4:14 89:7,8,8  
ready 23:20 111:7  
real 97:15  
realization 106:9  
realize 102:22  
really 11:5 36:21 44:3,21 54:21  
66:13 83:3 86:16,22 87:19 95:4  
100:12 103:19 104:23 107:3  
109:6 114:2  
reason 28:7 43:14 44:8  
reasons 6:7 107:19 112:18  
recall 6:11,16,19,21,23 9:23 12:8  
13:16,18 14:25 16:7 21:7,25 22:1

22:2,5 25:17 26:3 30:18 31:3 32:18 34:6 35:18 37:5 38:2 39:4 40:4,6 41:23 42:24 43:2,5,10 45:20 46:17 47:3,14,25 48:2 50:19 51:1 52:8 53:17,24 54:16 59:6,13,24 60:2,21 66:4 68:4,10 72:10 78:6 80:16 81:16,19 82:24 83:6 86:7 87:4 88:11 93:13 94:3 94:20 95:1,5,14 97:5 98:2,23 99:5,9,21 100:13,20 101:1 110:4 122:10 received 11:22 12:10 120:6,13 121:12 recognize 25:10 recognized 53:7 recollection 53:13 60:9 61:15 90:6 93:25 100:24 recollections 31:20 54:10,13 record 4:7,9 14:2 25:7 55:1 79:25 93:3,5 119:20 123:11 125:11 records 29:2 38:20 61:21 recounted 53:15,16 recurring 53:17 refer 58:9 61:16,20 67:2 77:17 90:7 119:22 reference 27:25 29:21 51:17 referenced 60:15 referred 61:12 83:18 91:5,6 93:14 referring 22:9 35:12 37:24 62:12 62:19 64:6,7 67:7,18 69:4,11 75:10 76:9 79:4 80:8 83:10 86:7 87:2 89:20 117:21 refers 77:21 reflection 82:18 refresh 4:21 60:9 100:24 regard 10:19 24:16 32:22 53:13 73:12 79:19 111:16 regarding 8:24,25 9:3 26:8 91:9 98:17 regular 23:9 97:14 regularly 98:9,10 related 88:18 92:2 93:20 96:13,14 96:17 120:9,21 122:4 125:13 relation 40:19 46:12 48:8 102:8 relationship 70:19 relax 20:23 41:9 105:20,22 relayed 30:10 released 62:10 remark 100:3,5,14 103:8 106:10 118:24 remarks 90:1 remember 9:22,25 20:19 21:11 25:25 29:5,10,12,13 32:20,21 54:24 58:15 83:1 97:16 99:25 119:17 remembering 19:14 remind 4:20 removed 91:3	rep 25:15,16,19 27:4 repeat 53:11 120:11 repeating 39:12 rephrase 5:24 88:25 92:7 107:23 115:8 120:12 report 8:8 122:3 reporter 1:24 4:23 5:3,14 89:5,12 122:8,13,15,16,24 123:2 reports 11:22 represent 26:12 reprimand 29:22 reputation 110:24 113:19,21 116:11 require 17:13 required 89:18 95:16 requirements 13:4 rescue 102:16,17 reserved 3:10 respect 99:14 111:2 118:2 respective 1:22 3:4 respond 104:18 responded 100:18 103:9 121:12 responding 121:21 response 6:12 100:6 109:18 110:21 114:21 responses 5:1 89:14 119:23 120:2 responsive 93:12 rest 55:6 76:18 resting 104:24 result 21:16 48:12 110:15 111:4 115:2,9 116:7,12 117:17 retained 4:18 retire 111:8 112:11 retirement 112:4 retreading 62:22 retrieval 19:11,12 34:14,20 returning 60:8 review 6:17 32:1,4 33:1,5 44:22 53:7 93:22 reviewed 31:23 32:9 33:21 110:6 reviewing 6:19 rewrite 53:9 rid 63:22 64:3,5 67:2,11,14 86:18 87:6 ride 94:18 ridicule 111:1 ridiculous 104:13 109:5 right 17:1 18:24,25 23:18,19 25:15 29:23 34:4,12 37:4,12 41:14 45:15 46:13 47:18 51:20,22 63:11 67:25 79:8,8 81:9 90:2,7 92:9 105:3 room 24:21 36:16,17,19 39:14,17 39:17 40:5,8 42:25 43:2 45:14,21 45:23,25 46:10 48:3,5,19,25 49:11,16,20,25 51:7 59:25 72:9 72:13 73:6,7,9 85:3 101:12 102:7 102:8,13,18,18 103:2	Roosevelt 1:6,8 2:15 7:3 63:25 101:17 102:25 103:4,8 117:5 rough 51:20 roughly 12:9 rules 89:4 rumors 114:3 rushed 109:5  <hr/> S S 2:1,18 3:1,1 4:1,1,6 safety 107:18 sat 39:18 satisfied 110:9 saw 70:22 saying 39:15 52:8 55:4,14 61:4,4 63:15 72:23 82:8,21 104:3 106:6 says 29:2,22 41:15,17 70:24 83:12 Scandaglia 36:5 37:13,17 school 1:6,8 2:15 4:18 7:3 9:2,10 9:18,18,19 10:11 11:14 12:3 21:2 21:5,12 22:7,8,9,15 28:5,14 32:6 42:8 45:11 56:6,7,12,23 57:15 61:11,14 62:6,8 63:16 64:2,13,14 64:17,19 65:12 69:16 70:15,21 71:22 72:11 75:25 84:14 85:19 86:4,9,12,14 87:1,5 91:7,20 92:11,15,18,25 94:10,18 95:19 95:25 96:3,12,16 98:18 101:17 104:10 105:7,10 107:24 108:8,17 108:24 114:1 120:6,9,20 121:13 schools 109:10 scope 54:14 screamed 43:3 44:5 screaming 42:22 44:6,9,25 45:6,7 script 89:8 sealing 3:5 seasonal 98:4 seat 40:17 seats 108:21 second 18:5 19:2 39:8 Section 29:20 sections 10:1,10,14 11:16 12:23 see 15:4,22 17:11 34:12,17 35:8,10 44:23 46:25 61:22 76:17 77:11 89:9,25 106:18 seeing 15:7 seek 42:9 seen 15:9 17:5 109:10 117:3,4,8,9 117:14 send 87:7 104:14,16 sense 9:12 105:23 107:9 sent 9:18 63:14 93:23 103:9 104:9 107:22 sentence 57:9 separate 92:14 September 6:12 7:8,10,20 8:4,17 8:23 9:4,20 11:18 12:1,8 13:12 13:14,19 14:4,14,18 15:9,14 16:4
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



16:11 17:22 21:20,22 22:2 24:14 24:19,22 42:15,16 71:5,10 72:6 72:20 75:24 85:5,15 series 88:17 serious 52:2 seriously 52:16 Sertraline 13:22 set 88:13 110:17 112:4 125:18 seven 12:11 15:8 35:5 59:19,19 severe 23:21,22 shake 5:3 63:21 68:15 shaking 46:25 47:2 share 33:9 shared 33:18 sheet 105:2 shorter 58:21 show 29:3 showed 35:15,19,24 115:17 showing 61:21 109:21 110:22 SIC 64:17 sick 39:14 40:3,22 41:2,3,12,15 42:5,12,17,18 60:7,13 61:5,6,9 62:11,18 96:6,9 side 19:15 35:25 36:2 sides 18:10 sign 75:6 signature 110:2 signed 3:13,15 6:23 76:2 110:6,10 119:4 signing 4:14 6:21 110:4 signs 116:1 SILVERMAN 2:14 similar 22:18,24 singing 21:12 sister 57:23,24 71:25 94:12,21,23 94:24 98:17,21 99:19 101:6,8,13 101:19 102:3,14,15,16,16 103:9 103:12,16,21 106:23 113:15,16 116:17 120:24 121:1,22 sister's 55:6 56:5 94:24 99:4,8,16 100:18 105:20,21 107:15 115:15 116:21 117:1 120:15 121:5,16,20 sit 90:5 93:16 105:24 112:10,13 120:7,17 122:1 sitting 40:10,19 48:24 49:15 58:22 situation 106:17,18 six 15:8 19:3,4 31:9 53:6 59:18 80:11 sixty-four 21:6 sixty-two 21:6 skip 90:21 slam 26:24 27:13,16,22 sloppy 34:3 small 36:16 smaller 10:7 smallest 97:8 Smith 2:18 4:6,17 23:19 24:24 25:6 49:22 51:15 52:23 54:4,9 55:22	82:14 85:11 88:5,16 89:3 95:14 124:4 social 70:14,21 113:13 softer 48:15 softly 71:19 Solomon 50:14,15 86:25 87:5,12 88:2 somebody 78:23 someplace 102:5 sorry 14:8 43:16 59:3 104:16 109:11 119:9 sort 42:9 54:12 60:18 62:25 108:1 sorts 90:21 102:1 space 14:1 Spanish 66:18 speak 5:13 52:24 65:2 73:25 84:22 84:25 88:25 89:6 102:23 103:6 104:1 122:24 speaking 5:13 48:15 49:5 58:10 71:18 114:13,20 specific 25:22 49:14 108:18 specifically 24:16 40:4 48:19 53:12 68:2 91:21 103:25 105:18 specificity 110:13 specifics 106:5 108:16 specified 111:4 specify 110:19 speculating 81:2,4 speculation 82:7 split 102:1 spoke 7:8 8:23 11:25 13:14 16:7 30:9 58:10 59:10,11,16,20 74:21 121:13 spoken 65:4 112:25 113:2,10 114:4 SS 123:9 St 43:13 staff 108:15 119:7,11 stairs 101:24 102:11,15 stamped 25:9 32:18 stand 57:19 61:10 standards 12:20 standing 48:8 101:20 108:20 start 4:12 5:10 103:11,15 started 9:19 16:23 23:23 42:22 43:14 47:14 48:11 90:8 99:2 starting 64:10 104:25 starts 18:9 Stassi 1:11 2:9 88:20 100:23 101:1 101:3 106:14 115:10 116:13 120:19 state 1:25 4:4,7,9 35:6,15 36:6 37:23 39:12 42:22 45:14 46:15 46:23 56:6 78:1,4 110:13 117:17 123:8 125:4 stated 49:10 93:19 95:6 statement 41:17 45:25 48:2,6,9,21 49:15,21,22 50:20,23 51:3,6,15 53:1 56:17,21 67:6 75:12,13,18	76:3 79:6,18 82:3 83:3,5,7,9,12 89:11 94:5 100:7,13 statements 40:2 46:5,11 55:15 states 1:1 26:23 34:13 60:4 63:10 69:1 77:10 statistics 115:25 stay 85:3 104:7 111:8 stenographically 125:9 Stenotype 1:24 Sticking 37:22 STIPULATED 3:3,8,12 stomach 41:5,7 115:5 stop 42:14 46:25 stopped 14:14 story 58:11 80:6,7 81:7,18 122:12 straight 23:23 straighten 104:8 strain 111:10 strange 80:5 81:6 Street 1:16 2:10 4:10 strength 28:21,23 stress 39:13 61:10 96:13 stressed 20:18 40:25 100:7 stressful 78:15 111:10 stressing 55:6 students 9:6,20 10:4 72:13 subjected 61:11 Subscribed 123:18 subsequent 6:15 33:18 49:7 50:2,6 60:22 123:1 substance 94:20 95:1 98:23 substances 19:17 substitute 43:5,6 suffer 109:11 suffered 46:1 110:23 116:6 117:19 suffering 110:25 114:24,25 117:24 suggest 25:19 58:1 suggestions 33:13 Suite 2:4,16 sum 94:20 95:1 98:23 summer 68:25 73:5 superintendent 69:10,15 supervision 125:10 supervisors 8:8,19 SUPPLIED 124:12 supposed 9:17 106:16 sure 5:1,12 29:5 31:25 39:18 43:14 54:11 67:22 81:11 100:16 115:13 121:3 Susan 1:2,20,23 4:3,8 101:13 110:1 123:16 124:4 125:3,22 sustained 110:14 swear 90:19 Swinkin 35:20 36:2 37:13,16 39:17 40:9,10 41:21 44:3 45:22 46:13 50:1 73:19 75:1 sworn 3:15 4:3 123:18 125:7 Sylvia 28:1 60:8 77:19,20
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

symptoms 18:8 22:19 23:6 24:8  
115:5

### T

T 2:7 3:1,1 4:1 125:1,1  
take 4:24 5:3,20 16:1,9,12,17,18,18  
16:23 17:7 18:1,20,21 19:1 25:5  
37:19 38:6,11,22 39:8 41:20,22  
46:19 47:4,7,12,24 52:5 55:17  
63:18 89:17,18 95:8,11 97:9,10  
97:14,17,19 98:3,13 103:6  
106:21 107:2 111:21 115:25  
119:18  
taken 1:21 6:3 11:19 39:1 62:6  
89:18 97:25 98:9 105:25 112:22  
112:23 116:15,18,24 117:21  
123:12 125:9  
talk 17:6 68:18 69:2 73:4,5,12,15  
114:22,24  
talked 27:6 47:17 69:6 73:8 74:2  
talking 17:2 26:6 36:24 48:20  
54:15 71:22 83:15  
talks 110:22  
Taller 58:21  
tangible 113:23,25  
taught 7:13  
teach 10:14 12:18 112:18  
teacher 43:4,5,6 87:9 111:13  
teachers 10:14 13:1 21:13 64:25  
65:4,5,7,11,14,15,17,20,22 72:15  
72:17 83:4,13 84:9,18,22 85:1  
87:7  
teaching 66:20,23 112:14  
team 31:5 84:24 85:1  
technician 88:21 115:20,22 116:8  
telephone 26:6 121:8  
tell 34:3,11 50:23 51:11 52:17  
67:10 70:11 72:1 76:2 86:8,12  
87:8 88:24 104:5 109:14  
telling 43:16 45:1,14 57:17 106:19  
106:25  
ten-thirty 99:7  
tenured 75:6  
terminated 87:20  
terms 22:19 48:14 53:12 111:12  
testified 4:5 14:23 15:14 54:1,9  
80:10 96:25 99:15 115:4,7,14  
testify 6:5,8  
testimony 6:11,24 32:7 54:3 96:20  
123:12 125:5,8,9,11  
therapist 15:12  
thing 5:18 23:11 27:10 72:24 78:18  
78:20 81:12 87:16 99:24 105:15  
109:9 119:21  
things 4:22,25 26:2,19 33:14 37:12  
54:2 64:2,22 106:23 114:3  
think 6:7 9:25 11:12 14:23 21:16  
22:14 23:17 25:21 28:21,24

33:11 34:21,24,25 45:22 48:7  
53:5 61:8,10 66:25 67:7 71:8  
78:20 80:20,21,25 84:7,8,11 85:9  
90:18 95:21 100:10 104:3  
thinking 61:16,25 62:24  
thinks 83:13  
thirty 56:3  
thirty-five 79:22  
thirty-four 77:9 79:21 89:23,25  
90:17  
thirty-nine 90:3,11  
thirty-one 59:1  
thirty-six 86:2 89:22  
thirty-three 76:7 90:14  
thirty-two 60:3 62:5  
thought 24:10 51:24 56:8 60:10  
62:19 74:10 78:6 81:6 86:16,17  
87:19  
thoughts 53:2  
threat 104:21 106:6,18  
three 10:5,6,10 20:6 27:9 37:9 56:7  
68:15,16,18 69:3,8 93:7 105:4,22  
110:12 113:5  
Thursday 63:22 86:5  
till 24:14  
time 1:23 3:10 5:11,17 6:23,24  
7:11,13 11:25 14:13,20 16:3,7  
17:1,16 20:10 22:2,4 28:15 29:6  
30:15 31:19,23 33:8,18 34:20,24  
36:7 38:6,24 39:18,21,24,25 40:2  
40:14 41:20,25 42:3,17 43:17,20  
45:11,23 46:11,24 47:2,7,19 48:3  
49:12,14,17,20,20,23 51:6 52:9  
60:25 62:22,24 63:3,4 64:8 66:4  
68:8 74:20 77:13 80:17 81:17  
88:23 94:4,9,22 95:15,18 98:16  
99:4,5,8,16,18 100:17 103:13,21  
103:22 104:15 105:5,9,25 106:9  
107:21 108:9 109:3 112:10  
115:14 116:18 117:21 118:23  
123:12 125:6  
timely 26:25 27:12  
times 12:3 20:6 40:8  
timing 91:22 94:1  
tiny 37:10  
tired 19:19,20  
today 4:19,22 6:5,9 7:10,21 8:5,7  
8:11,17 13:10 14:11,14 15:19  
16:11 24:14 32:13 48:24 49:15  
79:16 89:18 90:5 93:16 105:24  
112:10,13 120:7,18 122:1  
today's 32:2  
told 29:24 35:16 45:20 46:20 47:4  
47:18,19 50:19 56:11 57:15  
58:11 59:24,25 67:17,23 68:4  
69:5 71:16 72:19 75:13,17,20  
78:4 79:17 80:17 81:5,17 86:12  
86:14,15,19 87:22 95:7 105:18

105:19,21 108:24 114:22 116:23  
122:13  
tone 48:14,15  
top 42:22 44:25 60:3 62:5 90:17  
Topamax 13:22 19:11 96:22  
total 31:7  
touch 118:12  
train 24:9  
transcribed 125:10  
transcript 4:15 6:17,21,25 89:10  
98:5 123:14 125:11  
transcripts 32:7,10  
transferred 70:15  
transpired 94:18 105:7 108:17  
treated 96:18  
trial 1:20 3:11  
tried 70:11 99:20 114:6,7  
tries 89:9  
trouble 57:18 78:12  
true 1:9,14 75:15 123:14 125:11  
truthful 6:25  
truthfully 6:5,8 29:10  
try 71:24 85:3,3 114:7 119:14  
trying 34:24 44:13 54:23 57:5 62:9  
72:1 78:25 86:17 107:25  
Tuesday 60:4 71:6  
turban 59:9  
turn 32:17 110:12  
turned 91:2  
Turnpike 2:4  
twenty 35:5 46:22  
twenty-eight 42:21 55:5  
twenty-five 34:6 97:6  
twenty-four 6:4 9:8,24  
twenty-seven 37:22  
twenty-six 55:2  
twenty-three 10:6 61:20 90:10,14  
twice 16:18  
two 12:7 32:5 36:20 38:12,24 42:3  
55:15 56:16 102:20 112:24  
type 23:11 24:15 26:8 78:10 98:2  
110:13 111:20 124:15  
typically 18:2

### U

U 3:1 4:1  
uh-huh 5:4  
understand 5:23 50:5 57:13 88:23  
89:1 107:10  
understanding 69:18 87:15 121:11  
understood 87:4  
union 1:6,8 2:15 7:3 25:15,16,19  
27:3,4 30:11 58:12 59:5 109:4  
unit 107:2,6,7  
UNITED 1:1  
University 118:10  
unknown 1:10,14  
unneeded 109:11

unstable 118:6  
 untrue 83:9  
 unusual 45:3,7 95:23 96:2,7  
 upset 45:10 46:6 73:14 80:2,3  
   86:16 99:1 100:11 103:24 104:1  
   104:7,23  
 upsetment 64:17,18  
 upstairs 102:17  
 use 34:21 54:12  
 usually 18:9,12 20:20 25:25 26:2  
   87:6,7,9

**V**

verbal 5:1  
 verbally 118:13,14,15  
 verbatim 53:2 54:10  
 verification 109:24  
 verified 93:8 109:19  
 version 91:1  
 victim 117:18 118:2  
 visited 15:12 24:21  
 vital 115:25,25  
 voice 42:23 44:25 48:14 49:5  
 voiced 84:23  
 vulnerable 21:17

**W**

wait 19:1 89:5  
 waived 3:7  
 waiving 4:13  
 walked 35:23  
 want 19:12 20:19 25:25 28:4 52:10  
   54:11 55:20 67:22 75:2,5,9 78:5  
   78:9,16,17,22,24 87:6 90:18  
   111:7,12 112:2 114:22  
 wanted 33:7 34:21 57:12 75:4  
   86:10 99:2 103:23 107:16 111:8  
   111:11,21 112:7  
 wanting 78:7  
 wants 23:16  
 ward 57:12 114:18 116:19,24,25  
 Washington 65:23 66:11,12,25  
 wasn't 28:13 36:21 42:18 44:13  
   45:6 64:16 68:20 71:17,18 75:7  
   75:11,15 76:16 81:15 94:23  
 way 19:22 27:5 33:25 41:4 57:6  
   80:17 84:23 108:8  
 ways 4:22 13:10  
 we're 73:15  
 we've 53:7,14 109:10  
 week 16:19 20:6,24  
 weekly 16:16,17  
 went 18:24 23:23 41:10 79:2 87:15  
   88:1 102:3 104:11 109:3 114:1,2  
   120:25 121:4  
 weren't 66:13,20 68:3  
 West 1:16 2:10  
 wheelchair 36:7 37:25 40:13

wheeled 36:10,13 37:14  
 WHEREOF 125:18  
 White 2:17 66:2  
 window 47:21 51:16,22 60:1 100:8  
   106:11  
 windows 37:6  
 winds 89:10  
 wine 19:25  
 wish 46:24  
 withstand 28:25  
 witness 4:2 40:9 55:3 123:7 125:7  
   125:12,18  
 witnessed 106:11  
 witnesses 80:18 81:20 82:1  
 wobbly 24:2  
 WOLIN 2:3,3,5 4:12 8:14,20 11:6  
   12:5 13:7 14:1,6,22 18:16 22:22  
   23:16 24:12 26:4 27:18 28:10  
   29:12 33:3 34:4,15 35:2 36:1  
   37:19 38:9 39:7 40:7 44:11,14,18  
   45:4 46:3 48:16 49:2,19 50:25  
   51:9,13 52:12,18,22,24 53:10,19  
   53:21 54:1,6 55:20 61:3 62:1,7  
   63:7 65:1 66:22 67:7 68:17,23  
   69:21 70:2 77:2 80:20 81:1,21  
   82:2,5,20 84:1,10,20 85:9,25  
   87:18 92:4 93:3,6 96:4 98:8  
   99:11 100:9,15 103:13 106:2,12  
   107:8 108:2,9,11 109:23 112:20  
   113:22 114:14 115:3,12 116:9,14  
   116:20 119:21 122:21  
 Wollin 30:5  
 woman 58:19,20  
 word 19:12,13 34:14,20,21,24,25  
   35:3 54:23  
 words 108:17  
 wore 59:9  
 work 17:20,23 20:19 26:9 28:8,16  
   28:19 29:9 39:5 41:1 60:19 62:25  
   63:6 85:2 95:16 112:8  
 worker 70:14,21 113:13  
 worn 108:4  
 worried 83:3  
 worse 23:24  
 worst 35:7,9  
 Wortham 1:6 2:15 62:10 64:1,4,6  
   64:8 67:3,18 68:2 69:2,6,11  
 wouldn't 22:16 23:5 52:9 53:5  
   90:18  
 Wright 119:14  
 write 25:14,19 26:2 31:10,16 44:13  
   53:1 75:4,5 90:9  
 writing 25:23 31:13,19 32:21,24  
   44:17,20 47:25 76:19,21,24  
 written 26:7,15 68:3  
 wrong 56:24 78:22 79:4 87:9,16  
   107:1 108:5 117:12  
 wrote 25:13 26:13,20 27:23 31:10

32:19,20 33:2,8 34:2,7 44:16,22  
 53:2 57:6 60:11,17 67:15,16,23  
 69:9 80:19 81:8 90:20,21,24

**X**

X 1:2,15  
 Xanax 41:17,20,25 47:5,5,6,12,15  
   48:12 97:1,3,10,12 98:13

**Y**

Y 4:1  
 Y-E-D-I-N 65:23  
 Yeah 17:18 37:7 76:1  
 year 9:10,19 10:15 11:14,24 12:3  
   12:19 20:16 21:2,5 22:7,8,9,15  
   42:8 65:19,21,22 66:21,23 75:25  
   84:14 85:19 112:14,19  
 years 10:11 15:8 18:24 111:12  
   112:7,24  
 Yedin 65:25 66:19,24  
 yelled 101:13  
 yelling 43:4,6,12,18,18,21,22,24  
   44:2  
 yesterday 32:14 69:2  
 York 1:1,17,25 2:4,11,17 4:4,10  
   122:7 123:3,8 125:4  
 young 66:14,18  
 younger 66:8  
 youngest 113:7

**Z**

Zolof 13:22 19:8 96:22

**0****1**

1 1:16  
 1-10 1:9  
 1:08 123:7  
 10:20 1:18  
 10601 2:17  
 11-20 1:13  
 1102 2:16  
 11501 2:11  
 11753 2:4  
 11801 4:11  
 119 124:10  
 12 109:20  
 14 11:24 124:14  
 15 11:24  
 15-CV-1468 1:5

**2**

2013 20:15 21:1,4 22:9 66:24 85:18  
 2014 6:13 7:8,10,20 8:4,17,24 9:4  
   11:18,23 12:1,8 13:12,14,19 14:4  
   14:14,18 15:9,14 16:4,11 17:3,23  
   20:15 21:1,4,20,22 22:2,9,15

24:14,19,22 42:15,16 66:24 85:5 85:15,18 91:13 92:3 94:9 95:20 96:13 97:14 98:12,18 111:17 112:5 120:10,14 122:4 20143 117:4 2015 7:18 9:20 109:20 2016 1:18 123:19 125:19 215 2:4 23 25:9 26:21 24 124:9 25 32:18 25th 125:19 26 29:20 34:10 28 22:15 91:13 92:3 94:9 95:20 96:13 97:14 98:12,18 120:10,14 28th 21:8 22:12 24:5 35:13 42:16 50:2,6 51:7 53:14 70:17 73:2,6,7 73:13 74:1 79:7 94:5 97:10 115:2 117:3 29th 25:18,24 26:7 28:3 31:14 34:8 62:20  3 39 25:9 3rd 60:4,10 61:14,17 62:14,20 71:7  4 4 6:13 4-88 124:4 420 2:4 445 2:16  5 50H 88:10 52 4:10  6 6:30 77:11,25 6th 90:16  7  8 8 1:18 88-123 124:5 8th 4:10  9 9/13 63:10 911 69:7,19 70:9 71:21,23 72:20 73:2,10,17,20,23 79:10 104:19 913 63:15,15 98 124:15 9th 77:17,20,21		
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--